December 8, 2006
Project No. 105187006

Greg Holmes, Unit Chief
Southern California Cleanup Operations
Cypress Office
5796 Corporate Avenue
Cypress, California 90630-4732

Subject: Response to DTSC Preliminary Draft Comments
Closure Report
Renaissance at North Park
30th Street and El Cajon Boulevard
San Diego, California

Dear Mr. Holmes:

Ninyo & Moore is pleased to submit this response to the California Department of Toxic Substances Control (DTSC) preliminary draft comments regarding the document entitled "Closure Report, Renaissance at North Park, 30th Street and El Cajon Boulevard, San Diego, California," dated November 15, 2005. We received your comments to the closure report in a November 17, 2006 email from Ms. Linda Beresford of Opper & Varco, LLP (Appendix A). In addition, as requested by Ms. Beresford, we have provided comments pertaining to the necessity to conduct a soil vapor health risk assessment, and summarized the location and type of impacted soils remaining at the site following completion of remedial activities. In addition to this letter, a September 27, 2006 letter (Appendix A), was prepared by Ninyo & Moore to address County of San Diego, Department of Environmental Health (DEH) comments pertaining to the subject closure report (Appendix A).

In response to the preliminary draft DTSC comments pertaining to the Renaissance at North Park Closure Report, the following summary points are provided:

5710 Ruffin Road ▪ San Diego, California 92123 ▪ Phone (858) 576-1000 ▪ Fax (858) 576-9600
San Diego ▪ Irvine ▪ Rancho Cucamonga ▪ Los Angeles ▪ Oakland ▪ Las Vegas ▪ Phoenix ▪ Denver ▪ El Paso

DTSC Comment No. 1:

In the burn pit area, soil with lead levels up to 2,190 mg/kg was excavated and disposed of at an unnamed "industrial facility" near the Mexican border. Since TTLC for lead is 1,000 mg/kg, at least some of the soil met hazardous waste levels, indicating potential illegal transportation and disposal of hazardous waste. Aside from that, how has this offsite soil pile been addressed? Is it still there?

Ninyo & Moore Response:

Please refer to Table 6, Figure 7, and report section 10.4.5 of the Closure Report. None of the burned wastes or soils associated with the burn pit remediation were disposed of to an unnamed "industrial facility" near the Mexican border. Rather, the following activities were conducted in association with sampling and disposal of the former burn pit area:

- On September 14, 2005, three samples were collected prior to excavating the burned pit and impacted soils. One sample, referred to as Pit 1-1, was collected at a depth of approximately 2 feet below ground surface and contained 2,190 mg/kg lead (Table 6).

- On September 23, 2005, approximately 11 tons of burned material and soils impacted with elevated concentrations of lead, chromium and zinc were excavated to a depth of about 5 feet bgs and temporarily stored on-site. Burned wastes and soils at, and in the vicinity of, sample Pit 1-1 were excavated as part of the remediation. As indicated on page 13, Section 10.4.5 of the Closure Report, four samples were collected from the excavated, stockpiled soil and burned wastes to characterize these materials for off-site disposal. Lead concentrations of samples from the stockpiles ranged from 3.71 to 10.9 mg/kg. The analytical data was forwarded to the representatives of the Otay Landfill for their decision regarding potential disposal at their site. The Otay Landfill representatives accepted the soil based on the analytical results of the stockpile sampling.

- On November 2, 2005, the temporarily stockpiled burned wastes and soils associated with the burn pit remediation were transported off-site to the Otay Landfill under a non-hazardous waste manifest. The drum containing decontamination water was transported by EFR to Dome Rock Industries in Quartzite Arizona (Appendix A).

As indicated on Page 6, Section 10, and Figure 3 of the Closure Report, and in the September 2006 response letter to Mr. Moffat (Appendix A), the upper 4 to 5 feet of soil was excavated from the northern portion of the site during grading and disposed of off-site between June 28 and July 2, 2004. These soils were transported to an industrial facility at Boston Avenue and Camino

de la Plaza, immediately adjacent to the United States-Mexico border, in San Ysidro, California. The location of the soil disposition was provided to Ninyo & Moore by Mr. Daryl McFarland of Sun Country Builders in a July 12, 2006 e-mail (Appendix A). As previously stated, Ninyo & Moore personnel were not on-site during the removal of the upper 4 to 5 feet of soil because the necessity to monitor and sample this soil during grading was not communicated to the grading subcontractor (Mountain Movers) by the General Contractor (Sun Country Builders). Ninyo & Moore is not aware of any characterization sampling conducted prior to transportation and off-site disposal of this soil.

DTSC Comment No. 2.

There is no mention of sampling for dioxin at the burn pit area. How was the potential presence of dioxin ruled out?

Ninyo & Moore Response:

Ninyo & Moore prepared a work plan in September 2004, in response to the County of San Diego, Local Enforcement Agency (LEA) request for a work plan, and community health and safety plan in association with the planned remediation of the burn pit at the site. The work plan indicated that following visual removal of the burn pit, soil samples would be collected from the excavation floor, and sidewalls and field screened for total lead using an x-ray fluorescence (XRF) meter. In addition, confirmation soil samples were proposed to be analyzed for Title 22 metals by United States Environmental Protection Agency (USEPA) Methods 6010B, and 7471, and for polynuclear aromatic hydrocarbons (PAHs) by USEPA Method 8270C. The work plan did not propose dioxin analytical testing. The work plan was approved by the LEA in a letter dated, September 22, 2004 (Appendix A).

The LEA Advisory 56 - Process for Evaluating and Remediating Burn Dump Sites (CIWMB, 1998), and the DEH Site Assessment and Mitigation Manual (SAM) manual (DEH, 2004), that includes a copy of LEA Advisory 56 for their section on burn ash site investigations, are regulatory guidelines to evaluate and remediate burn sites. These guidelines suggest that at a minimum, testing should include metal analyses. The document states, "*In addition, testing for dioxins and*

furans may be appropriate if evidence suggests that these constituents would likely be present from the type of waste combusted, and/or the site is located in an urban area with a number of sensitive receptors nearby and where there is a high risk to human health and safety." It has been our experience for burn site projects that analytical testing for dioxins and furans is site-specific. It is typically conducted at sites where wastes are likely to remain in place (i.e., are not removed), and there are potential sensitive receptors and/or human health issues. Dioxin testing often is not conducted at sites where the volume of wastes is small and planned to be removed. In addition, the Department of Toxic Substance Control (DTSC), Protocol for Burn Dump Site Investigation and Characterization (DTSC, 2003), similarly states that analysis for non-metals such as dioxins, furans, TRPH, SVOCs, and dioxins/furans are often warranted at burn dump sites depending on site-specific scenarios such as adjacently located sensitive or urban receptors, visual observation stained soil, and records review indicating contamination or spillage warrant testing for organic constituents.

It was our opinion that analytical testing for dioxins and furans was not warranted for the subject burn pit due to the small volume of burned wastes, the fact that these wastes and associated impacted soils were removed from the site by excavation, and the off-site facility that accepted these wastes, the Otay Landfill, did not require dioxin or furan analytical tests as part of evaluating these wastes for disposal at their landfill.

DTSC Comment No. 3:

The Remedial Action Work Plan described choosing soil sampling locations based on field screening by XRF. However, it appears this procedure was not followed, and the 38 soil sample locations were randomly chosen instead.

Ninyo & Moore Response:

Neither the September 16, 2004 remedial action work plan, prepared for the planned assessment and remediation of the small area of burn pit wastes on the Heilig Meyers property, nor the December 17, 2004 work plan, prepared for additional assessment of the former underground storage tank (UST) at 4327 Kansas Street, were the subject of the 38 soil samples collected site

wide in association with grading. Because neither of these work plans were the subject of the 38 soil samples collected in association with site grading, there was never mention of screening these samples by XRF.

Assuming the work plan referred to by the DTSC is the September 16, 2004 remedial action work plan; as indicated in Section 7 of this plan, burned wastes and impacted soils, if any, were proposed to be removed based on visual observations. Then, soil samples were proposed to be collected from the excavation floor and sidewalls, individually homogenized, and field screened for total lead using an XRF meter with a detection limit of no greater than 40 milligrams per kilogram (mg/kg). If field screening indicated the presence of total lead greater than 40 mg/kg, additional soils in the area of the failing sample(s) were proposed to be excavated until field screening results of samples collected were below 40 mg/kg. When the XRF field screening indicated total lead concentrations below 40 mg/kg, a confirmation soil sample was proposed to be collected from each homogenized sample used for final field screening for laboratory analysis, up to 10 confirmation soil samples. The work plan pertained to using the XRF as a screening tool, associated with the burn pit remediation, and not the 38 samples associated with site grading.

DTSC Comment No. 4:

The Work Plan states that areas would be considered "clean" when no more than 50 mg/kg of soil remained. However, it appears that concentrations greater than this level were left at the site. One sample from the graded area showed a lead level of 200 mg/kg (above the U.S. EPA PRG of 150). There is no discussion of any step-out sampling or additional excavation in that area, or other areas where lead concentrations over 50 mg/kg were apparently left in place.

Ninyo & Moore Response:

As indicated in the prior response to DTSC comment No. 3, and also pertaining to the subject DTSC comment, neither of the work plans associated with this site pertained to the 38 soil samples collected in association with site grading. However, the clean up goal for the site, with respect to lead, was 50 mg/kg. The sample containing 200 mg/kg lead, that the DTSC refers to, appears to be sample S4 (Figure 4 of the Closure Plan), in association with the 38 randomly col-

lected site-wide soil samples associated with grading, not the burn pit remediation pertaining to the work plan.

As indicated in Section 10.2, and shown on Figure 5 of the Closure Plan, three additional soil samples were collected at location S4 because it contained lead at a concentration greater than 50 mg/kg, and detectable concentrations of TPH. As indicated in Section 10.2, at the location of sample S4, and at seven other locations, *"The soil was excavated to a minimum of 6 inches below the depth where the sample was initially collected. The excavations were approximately 6-feet square centered on the initial soil sample location. Following excavation, three soil samples were collected from the bottom of each excavation area and analyzed for TPH and total lead."* The three confirmation soil samples collected after the additional soil removal at S4 (S4-CON-1, S4-CON-2, S4-CON-3), contained lead at concentrations of 5.19, 5.54, and 5.89 mg/kg, and TPH was not detected. To the contrary of the DTSC comment, additional excavation and step-out sampling was conducted at location S4, where lead initially was present at 200 mg/kg, and similar additional excavation and analytical testing was conducted at seven other locations where initial lead concentrations exceeded 50 mg/kg and/or TPH was detected. Initially at three of the seven locations, lead concentrations exceeded 50 mg/kg (S9, S27, and S34) and soil was excavated at each of these areas and confirmation samples were collected documenting lead concentrations below 50 mg/kg.

As indicated in Section 10.5, Table 8 and Figure 9 of the Closure Plan, soil samples collected immediately below each end of the former UST contained TPH-G at concentrations of 39 and 44 mg/kg, TPH-D at 260 and 140 mg/kg, and TRPH at concentrations of 610 and 110 mg/kg. Additional analytical testing of the soil sample, containing the highest TPH-D, indicated ethylbenzene and naphthalene at concentrations of 8.9 and 180 ug/kg, respectively. Because petroleum hydrocarbons and VOCs were detected in the UST closure soil samples, approximately 50 cy of soil was removed from the area of the former UST under the DEH pre-approved post-tank closure plan, and temporarily stockpiled on site. At that time, the excavation was approximately 12 feet by 12 feet by 7 feet deep.

Following initial excavation, four soil samples were collected from the excavation sidewalls and analyzed for TPH-G and TPH-D. TPH-G was detected at concentrations ranging from 8.5 to 190 mg/kg, and TPH-D was detected at concentrations ranging from 140 to 5,400 mg/kg (Figure 8 and Table 7 of the Closure Plan). It was recommended, that additional soil remediation be conducted based on the analytical results indicating the presence of TPH in the soil samples following the implementation of the post tank removal assessment. Additional soil remediation activities were conducted, by enlarging the excavation horizontally and vertically, in an effort to remove the impacted soils from the release area. Twenty-three confirmation soil samples were collected and analyzed, 14 from the excavation sidewalls, nine from the floor, and an additional three samples associated with extending the western wall of the excavation due to initial sample analytical results.

Because several utilities were known to exist south of the UST remedial excavation, including a high-pressure gas main and a fiber optic communications line, additional excavation along the southern side wall and to depths greater than approximately 15 feet bgs could not be accomplished. After impacted soils were removed to the extent possible, one soil sample from the southern excavation sidewall, SW2-10, and one excavation floor sample, B7-17' in the center of the excavation, contained TPH-D, at concentration of 750 and 520 mg/kg, respectively. None of the other confirmation soil samples contained concentrations of TPH above reporting limits. The locations of these two samples are shown on Figure 9, and illustrates that the impacted soil does not extend off-site. The confirmation soil samples were also analyzed for benzene, toluene, ethylbenzene, and xylenes (BTEX), and naphthalene. None of the samples, including the two samples containing elevated TPH-D, contained these constituents above their respective reporting limits. The absence of these VOCs in the samples tested precludes conducting a soil vapor health risk assessment at this time.

In summary, based on site assessment and remediation activities conducted at the site, impacted soils associated with site grading were excavated and disposed of off site; burn pit wastes and impacted soils were excavated and disposed of off-site; and impacted soils associated with the Aztec Bowl UST remediation were excavated and disposed of off-site. Soil remediation, associated with the Heilig Meyers/Kansas Street UST, involved removal of the majority of petroleum

hydrocarbon-impacted soil; however, some impacted soils could not be removed due to access limitations. Based on our assessment, impacted soils do not appear to extend off-site.

We appreciate the DTSC review and comments to the Closure Report, and trust the explanations given above clarify any outstanding questions regarding the remedial activities conducted at the site. If you have any questions or comments regarding this letter, please contact the undersigned.

Sincerely,
NINYO & MOORE

W. Scott Snyder, P.G., HG.
Senior Hydrogeologist

Beth S. Abramson-Beck, P.G.
Principal Geologist

WSS/BAB/yd/kmf

Distribution: (1) Addressee
(1) Ken Cluskey, Carter Reese & Associates, 2250 4th Ave, Suite 300 San Diego, CA 92101
(1) Brady Gunther, San Diego Interfaith Housing Foundation, 7956 Lester Ave. Lemon Grove, CA 91945
(1) Ewan Moffat, County of San Diego, Department of Environmental Health, 1255 Imperial Avenue, 3rd Floor, San Diego, California 92101
(1) Linda C. Beresford, Opper & Varco, LLP, 225 Broadway, Suite 1900, San Diego, California 92101
(1) Robert Russell, Procopio, Cory, Hargreaves & Savitch LLP, 530 B Street, Suite 2100, San Diego, CA 92101

Attachments: Appendix A – Background Data
Appendix B – Selected References

APPENDIX A

BACKGROUND DATA

Scott Snyder

From: Moffat, Ewan [Ewan.Moffat@sdcounty.ca.gov]
Sent: Wednesday, January 18, 2006 3:44 PM
To: Scott Snyder
Cc: Linda Beresford
Subject: Northpark Closure Document.

Scott,

Here are some preliminary comments regarding 11/18/05 Closure Report. For the time being, I'll include comments relating to the LOP (west) tank; however, a separate document for the LOP tank will most likely be needed for that release in the future. Either way, all LOP tank related information should still be copied into the VAP document.

1. Page 6, 10.1 3rd line, has a statement regarding the northern portion being excavated prior to Ninyo & Moore taking on the job. This is very significant! I realize that Ninyo & Moore has nothing to do with that event but I will still need information regarding:

a. Any sampling that that could of occurred before, during and after this excavation (done by whomever),

b. Why this was done without advising us?
c. (most important), Where did that excavated soil go? Where is it now?

2. Soil gas locations and results. Although, Ninyo & Moore did not perform this, a diagram with the locations and results (over limits) should be included. A request for closure document (sort of like a CAP) should include all pertinent information even that done by other consultants. Perhaps you could superimpose the soil gas sample points onto a diagram like Figure 2.

3. Burn pit. Figure 7. Looks good but I need some vertical definition here. In short, two sets of cross sections (N-S and E-W) will be needed for the pit area alone.

4. Kansas Street (LOP) tank. Figure 8. Looks good but I need some vertical definition here. In short, two sets of cross sections (N-S and E-W) will be needed for the UST excavation area alone.

5. Kansas Street (LOP) tank. Figure 8 and Table 8. B7-17' TPHd – 520 ppm. Even without the vertical profile requested on item #4, I can see that 17' is the deepest portion of this excavation. 520 ppm TPHd at the bottom will require further vertical delineation such as a boring or further excavation.

I conducted a site visit today and it's looking good (former LOP tank area not yet built on, that helps!). If I have any more comments, I'll pass them your way.

Ewan Moffat
Environmental Health Specialist
Phone (619) 338-2212
Fax (619) 338-2315
ewan.moffat@sdcounty.ca.gov

Scott Snyder

From: Scott Snyder
Sent: Tuesday, December 12, 2006 4:14 PM
To: Scott Snyder
Subject: FW: Renaissance early grading

-----Original Message-----
From: Daryl McFarland [mailto:dmcfarland@suncountrybuilders.net]
Sent: Wednesday, July 12, 2006 5:18 PM
To: Scott Snyder
Subject: RE: Renaissance early grading

Scott,

The export prior to discovery of the oil drum was taken to an industrial site at Camino de la Plaza and Boston Avenue in San Ysidro. This location is immediately adjacent to the border with Mexico.

From: Scott Snyder [mailto:ssnyder@ninyoandmoore.com]
Sent: Wednesday, July 12, 2006 12:57 PM
To: Daryl McFarland
Cc: Brian Wardwell
Subject: RE: Renaissance early grading

Daryl,

Yes, that is correct.

The reason we need the information is we prepared a closure report for the project for our involvement, part of which was to monitor the soil as it went off site. That soil we are talking about is the only soil we did not see go offsite. So if we can find out where it went, the County Environmental Health will be satisfied, and we can close this report.

Please call me if you have questions.
Scott

Scott Snyder, PG, HG
Senior Hydrogeologist
Ninyo & Moore
5710 Ruffin Road
San Diego, California 92122
858.576.1000 x1255

-----Original Message-----
From: Daryl McFarland [mailto:dmcfarland@suncountrybuilders.net]
Sent: Wednesday, July 12, 2006 12:31 PM
To: Scott Snyder
Cc: Brian Wardwell
Subject: Renaissance early grading

Scott,

As Brian was not involved in this project early on, I am taking over for him on your request for information.

My understanding is that you are looking for the location(s) which received the export soils prior to discovery of the oil drum. Is this correct, and for what purpose?

Thanks,

Daryl McFarland
Sun Country Builders
138 Escondido Ave., #204
Vista, CA 92084
760-630-8042 - phone
760-630-3718 - fax

Scott Snyder

From: Linda Beresford [lindab@envirolawyer.com]
Sent: Friday, November 17, 2006 4:10 PM
To: Scott Snyder
Subject: FW: Memo re North Park Renaissance Project in San Diego

Comments from DTSC

Linda C. Beresford
Opper & Varco LLP
225 Broadway, Suite 1900
San Diego, CA 92101
(ph) 619-231-5858
(fax) 619-231-5853
-----Original Message-----
From: Greg Holmes [mailto:GHolmes@dtsc.ca.gov]
Sent: Friday, November 17, 2006 4:13 PM
To: Linda Beresford
Cc: Bonnie Wolstoncroft; Caren Trgovcich; Greg Sweel; Loveriza Sarmiento; Thomas Cota; Richard Opper; George McCandless; John Anderson
Subject: Re: Memo re North Park Renaissance Project in San Diego

Linda,

DTSC's preliminary draft comments on the Renaissance at North Park Closure Report are as follows:

1. In the burn pit area, soil with lead levels up to 2,190 mg/kg was excavated and disposed of at an unnamed "industrial facility" near the Mexican border. Since TTLC for lead is 1,000 mg/kg, at least some of the soil met hazardous waste levels, indicating potential illegal transportation and disposal of hazardous waste. Aside from that, how has this offsite soil pile been addressed? Is it still there?

2. There is no mention of sampling for dioxin at the burn pit area.
How was the potential presence of dioxin ruled out?

3. The Remedial Action Work Plan described choosing soil sampling locations based on field screening by XRF. However, it appears this procedure was not followed and the 38 soil sample locations were randomly chosen instead.

4. The Work Plan states that areas would be considered "clean" when no more than 50 mg/kg of soil remained. However, it appears that concentrations greater than this level were left at the site. One sample from the graded area showed a lead level of 200 mg/kg (above the U.S. EPA PRG of 150). There is no discussion of any step-out sampling or additional excavation in that area, or other area where lead concentrations over 50 mg/kg were apparently left in place.

Greg Holmes, Unit Chief
Southern California Cleanup Operations
Cypress Office
direct (714) 484-5461
fax (714) 484-5438

>>> "Linda Beresford" <lindab@envirolawyer.com> 11/17/2006 10:04:47 AM
>>>
Hello Greg,

Will we be receiving a memo discussing any concerns you may with this project today? It would be extremely helpful to have this information in advance of our meeting Monday.

Thanks.

Linda

Linda C. Beresford
Opper & Varco LLP
225 Broadway, Suite 1900
San Diego, CA 92101
(ph) 619-231-5858
(fax) 619-231-5853

THE CITY OF SAN DIEGO

September 14, 2004

Ms. Janice Kluth, Project Manager
Carter Reese and Associates, LLP
3636 Fifth Avenue, Suite 300
San Diego, CA 92103

Subject: Renaissance Residential Development Burn Ash Pit

Dear Ms. Kluth:

The City of San Diego Solid Waste Local Enforcement Agency (LEA) is certified by the California Integrated Waste Management Board (CIWMB) to enforce state solid waste laws and regulations for active and closed solid waste sites in the City of San Diego including historical burn ash disposal sites.

The LEA was notified by the City of San Diego Mitigation Monitoring Coordination staff of potential burn ash pit during excavation work being conducted for the Renaissance Residential Project located on the northwest corner of 30th Street and El Cajon Boulevard in the City of San Diego.

I conducted a site visit on September 13, 2004 and met with Mr. John Ferrell, Sun Country Builders Superintendent. I did observed visual indicators, including but not limited to ceramic shards, melted glass, cobalt blue glass and ash like soils, to support the presence of a burn ash and related debris. The burn ash materials appear to be isolated and limited in volume, typically associated with historical residential burn ash pits. In speaking with you later that afternoon, you indicated that the suspected burn ash materials will be characterized, excavated and ultimately disposed of off site.

In order to expedite the excavation of the suspect burn ash materials, please provide the following for LEA review and approval prior to excavation activities:

1. An application for technical review with an initial deposit of $320.00 payable to the City of San Diego.
2. A Sampling Plan for burn ash characterization. At a minimum the plan should discuss: site location and background, project purpose, project tasks, methodology, equipment, sampling procedures and locations, decontamination, sample containers and.

preservations, disposal of residual materials, analyses of concern, analytical procedures, quality control, chain of custody and health and safety issues.

3. A Clean Closure Proposal for the removal of burn ash and impacted soils. This plan should include site characterization, excavation and material management, confirmation of waste and degraded material removal, and a Community Health and Safety Plan

Due to the nature of the burn ash discovery, it is advised that archeological surveying and burn ash sampling activities should be coordinated and occur simultaneously.

Upon completion of the above requirements, a Final Report will be required within 30 days identifying total volume of burn ash material removed, final disposition of burn ash and impacted soils and all confirmation analysis.

If you have any questions or would like to meet and discuss any of the above, please call me at (619) 533-3694.

Sincerely,

Rebecca Lafreniere

Rebecca Lafreniere, REHS
Solid Waste Inspector III

cc: Jeannette Temple, City of San Diego Project Management
Catherine Rom, City of San Diego MMC
Myra Herrman, City of San Diego LDR-EAS
Ewan Moffat, County of San Diego DEH-VAP
Scott Synder, Ninyo & Moore
Larry Person, Brian F. Smith & Assoc.

CLOSURE REPORT
RENAISSANCE AT NORTH PARK
30TH STREET AND EL CAJON BOULEVARD
SAN DIEGO, CALIFORNIA

PREPARED FOR:
County of San Diego, Department of Environmental Health
1255 Imperial Avenue, Suite 300
San Diego, California 92101

PREPARED BY:
Ninyo & Moore
Geotechnical and Environmental Sciences Consultants
5710 Ruffin Road
San Diego, California 92123

November 15, 2005
Project No. 105187006

November 15, 2005
Project No. 105187006

Mr. Ewan Moffat
County of San Diego, Department of Environmental Health
1255 Imperial Avenue, Suite 300
San Diego, California 92101

Subject: Closure Report
Renaissance at North Park
30th Street and El Cajon Boulevard
San Diego, California

Dear Mr. Moffat:

Ninyo & Moore is pleased to submit this closure report for the subject project (Site). This report documents the results of onsite project activities, which generally included closure of two underground storage tanks and follow on soil remediation, remediation of lead and petroleum hydrocarbon impacted soils at select Site locations, remediation of a burn ash pit, and oversight of soil excavation, and export monitoring.

The attached report presents our methodologies, findings, conclusions, and recommendations regarding the project activities. Ninyo & Moore requests concurrence from the County of San Diego Department of Environmental Health that no further remedial action is necessary at the Site and a Certificate of Completion be issued for the Site in accordance with Cal. Health & Safety Code Sections 252645(b) and (c) and 33459.3.

If you have any questions or comments regarding this report, please contact the undersigned.

Sincerely,
NINYO & MOORE

W. Scott Snyder, P.G., HG.
Senior Hydrogeologist

Beth S. Abramson-Beck, P.G.
Principal Geologist

SB/WSS/BAB/yye

Distribution: (1) Addressee
(1) Mr. Thomas Carter; Carter Reese & Associates
(1) Mr. Matthew Jumper; San Diego Interfaith Housing Foundation
(1) Ms. Linda Beresford; Opper & Varco LLP

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1. INTRODUCTION

Ninyo & Moore is pleased to present this report summarizing our environmental consulting services for the Renaissance at North Park project located at 30th Street and El Cajon Boulevard, in San Diego, California (Site, Figure 1). The project Site (Assessor's Parcel Numbers [APNs] 446-162-07-00 to 11-00, 446-162-13-00 to 17-00, 446-162-20-00, 446-162-25-00, and 446-162-26-00), consisting of 2.5 acres, is being developed as a mixed use project including senior housing, low-income housing, market-rate housing, a community center, retail space, surface parking, and one level of below-ground parking over a portion of the Site.

2. PROJECT OBJECTIVE

The primary purpose of the work described in this document was to provide, on an as-needed basis, general soil excavation oversight and monitoring services and assessment and remediation services associated with specific areas where soil contamination was discovered during the course of the project. Work was conducted in accordance with applicable provisions of the Monitoring, Mitigation, and Reporting Plan (MMRP) prepared by the Site (City of San Diego, 2003) and also in accordance with the Polanco Redevelopment Act, Cal. Health & Safety Code §§ 33459 *et seq.*. To accomplish the project objectives, Ninyo & Moore completed underground storage tank (UST) closures, conducted several assessments that evaluated and remediated contaminant-impacted soils, and provided excavation monitoring and soil export documentation services.

3. MITIGATION, MONITORING, AND REPORTING PROGRAM

In 2003, the City of San Diego developed an MMRP for the project as part of a Finding of No Significant Impact pursuant to the Housing and Urban Development National Environmental Policy Act guidelines and Mitigated Negative Declaration pursuant to the California Environmental Quality Act. The MMRP was prepared to ensure that development of the Site would avoid causing significant environmental impacts.

The applicable sections of the MMRP for this work include Water Quality (Section V.D.3) and Health and Safety (Section V.F.2.) which discuss excavation of potentially contaminated soils. Section V.D.3 states that the Department of Environmental Health (DEH) should be notified if contaminated soil is encountered during excavation, that the DEH would prescribe the method of treatment, the contaminated soil would be managed as directed by the DEH, and the cleanup of contaminated soil would be to the satisfaction of the DEH. Section V.F.2 (Health and Safety) states that soil grading in the vicinity of Aztec Bowl would require an assessment by an environmental consultant to evaluate if impacted soils or subsurface objects are present. If encountered, impacted soil would have to be remediated to the satisfaction of the DEH.

4. POLANCO REDEVELOPMENT ACT

On January 13, 2003, the Cal-EPA Site Designation Committee designated the DEH to act as the administering agency for the site investigation and remediation of hazardous waste for the Site. The designation was made pursuant to the requirements of Cal. Health & Safety Code §§ 25260 *et seq.* and Cal. Health & Safety Code §§ 33459.1(a), (d)(1), so that the project could proceed in accordance with the Polanco Redevelopment Act. Therefore, all plans were reviewed and approved by the DEH under the Act and closure for this matter will request a Certificate of Completion pursuant to Cal. Health & Safety Code Sections 25264(b) and (c) and 33459.3.

5. SCOPE OF SERVICES

The scope of services for the project generally included the following:

- project management and coordination,
- review of previous environmental assessments for the Site,
- preparation of a Site-specific health and safety plan (HASP) for Ninyo & Moore employees and its subcontractors,
- regulatory agency notification of project activities,
- attendance at construction project meetings,

- assessment and remediation of contaminated soil throughout the Site,
- removal of one UST at the former Aztec Bowl property (4356 30th Street) and follow on soil remediation,
- preparation of a work plan and community health and safety plan for a burn pit assessment and remediation on the Heilig Meyers property (2930 El Cajon Boulevard),
- assessment and remediation of the burn ash pit,
- preparation of a work plan and community health and safety plan for a UST assessment and remediation at the former Heilig Meyers property (4327 Kansas Street),
- removal of the UST and follow on soil remediation,
- soil excavation monitoring and soil export documentation associated with Site grading,
- sampling of temporary stockpiles, laboratory analyses, and profiling for off-Site disposal, and
- preparation of this report documenting the UST removals and associated remediation, burn ash pit assessment and remediation, assessment and remediation of other impacted areas, and the on-call environmental field services, monitoring, characterization, and export of soils.

6. SITE LOCATION AND DESCRIPTION

The Site is a portion of the city block that is bounded by Kansas and 30th Streets, El Cajon Boulevard, and Meade Avenue within the city of San Diego, California (Figure 2). The Site is being developed as a mixed use project including senior housing, low-income housing, market-rate housing, a community center, retail space, surface parking, and one level of below-ground parking over a portion of the Site. A portion of the Site includes one level of underground parking. The immediate Site vicinity consists of residential and commercial land uses.

7. BACKGROUND

7.1. Phase I Environmental Site Assessment

In January 2003, Southern California Soil & Testing, Inc. (SCST) conducted a Phase I Environmental Site Assessment (ESA) of the Site. Based on the results of their ESA, SCST

concluded that the land use history of the Site included a former gasoline service station (from 1940 to 1955); a Pacific Telephone and Telegraph Service Garage (1955 to 1960); and an auto body shop at 4356 30th Street and that USTs from historical operations may be present at that location. The Site also included a former dry cleaner (1960s) operated as Master Cleaners at 4328 30th Street; and a printing shop located at 4327 Kansas Street. The Site has also been occupied by several retail establishments and residential dwellings. SCST also indicated that USTs used to store heating oil for homes and commercial businesses have been discovered in areas of San Diego and that such activities may have occurred at the Site.

7.2. Phase II Environmental Site Assessment

Based on the results of the ESA, in March 2003, SCST conducted a limited Phase II ESA consisting of a soil vapor survey during which 41 soil vapor samples were collected between 3.5 and 5 feet below ground surface (bgs). The samples were analyzed for volatile organic compounds (VOCs) by United States Environmental Protection Agency (USEPA) method 8260B. Toluene was detected in six soil vapor samples at concentrations ranging from 1.0 to 1.7 micrograms per liter (µg/ℓ); xylenes were detected at a concentration of 2.1 µg/ℓ in one soil vapor sample. Soil sampling and analysis were not part of the subject assessment.

8. HEALTH AND SAFETY

8.1. Site Health and Safety Plan (SHSP)

For the assessment and remediation work conducted as part of this project, Ninyo & Moore personnel prepared a SHSP that identified the potential chemical and physical hazards that may be encountered during the planned field activities. The SHSP provided guidelines for Ninyo & Moore and subcontractor personnel to follow including use of personal protective equipment based on Site-specific conditions, location of and directions to the nearest hospital, and contingency plans. Ninyo & Moore personnel and subcontractors were required to

review, understand, and sign the SHSP. A copy of the SHSP is on file at the Ninyo & Moore San Diego office.

8.2. Community Health and Safety Plan

Community Health and Safety Plans were prepared by Ninyo & Moore for the burn ash pit assessment and remediation activities, and the assessment and remediation activities for the Kansas Street UST. The Community Health and Safety Plans are discussed in the relevant sections of this report.

9. SOIL EXCAVATION AND EXPORT OVERVIEW

The overall on-call environmental services associated with grading the Site generally involved Ninyo & Moore personnel sampling, observing, monitoring, and documenting the excavation of the upper 4 to 5 feet of soil, and subsequent removal of the soil from the Site. Soil was also excavated to depths of up to approximately nine additional feet in the portion of the Site planned as an underground parking structure. Approximately 10,000 cubic yards (cy) of soil was excavated from these areas and removed from the Site. Ninyo & Moore personnel visually observed the soil during excavation and/or loading onto the trucks, and field screened soil and monitored air quality with a photoionization detector (PID) in the vicinity of the excavation and where the soil was being loaded onto trucks for off-Site reuse.

While excavating the upper 4 to 5 feet of soil, two USTs were discovered at two separate locations of the Site (Aztec Bowl, 4356 30th Street and Heilig Meyers, 4327 Kansas Street) and a burn pit was discovered on the Heilig Meyers portion of the Site at 2930 El Cajon Boulevard. These three areas of potential soil contamination and/or buried wastes were initially excluded from mass grading activities until they had been assessed and the impacted soils removed from the Site. Assessment and remediation activities associated with these areas are discussed in subsequent sections of this report.

10. SOIL ASSESSMENT AND REMEDIATION ACTIVITIES ASSOCIATED WITH SITE GRADING

In an August 2, 2004 telephone conversation, the soil excavation, sampling and analysis program and the soil export plan associated with grading the Site were verbally approved by Mr. Ewan Moffat of the DEH. On August 4, 2004, an email was sent to Mr. Moffat to confirm the August 2, 2004 plan approvals. An email approval of the sampling and analysis program was received on August 24, 2004 from the DEH (Appendix A).

Prior to excavation of the upper 4 to 5 feet of soil, Ninyo & Moore personnel collected randomly-located samples to chemically characterize the soils and generally assess the presence or absence of soil contamination. This upper zone of soil generally consisted of unsuitable clayey soil, all of which was exported off Site. From September 1 through 10, 2004, Ninyo & Moore personnel were on Site and observed the soil excavation activities and/or export. However, personnel were not at the Site for the period between June 28 and July 2, 2004. According to the general contractor for the project, the soil exported form the Site in late June and early July 2004 was transported to an industrial facility in the Otay Mesa area of San Diego County. Table 1 summarizes the dates, soil volumes, and destinations of the soils exported from the Site.

10.1. Soil Assessment

On July 28, 2004, Ninyo & Moore personnel collected 38 randomly located soil samples, B1 through B38, from depths of 0.1 to 3.9 feet, to generally chemically characterize the soils prior to their excavation and export from the Site (Figure 3). The northern portion of the Site was not sampled since the upper 4 to 5 feet of soil in this area had already been excavated and exported from the Site prior to Ninyo & Moore initiating Site activities. Based on historic Site use, the soil samples were analyzed for constituents of potential concern (COPCs) including total petroleum hydrocarbons (TPH) by Department of Health Services (DHS) Method 8015M, volatile organic compounds (VOCs) by USEPA Method 8260B, and Title 22 metals or total lead by USEPA Methods 6010B and 7471.

Analytical results indicated seven samples contained TPH at concentrations above the reporting limit of 5 milligrams per kilogram (mg/kg); three of the seven samples also contained lead concentrations above 50 mg/kg. One soil sample contained lead at a concentration also above 50 mg/kg, but TPH was not detected above the reporting limit (Table 2, Figure 4). The remaining soil samples did not contain metal concentrations that would suggest leachability would be a concern and/or that the soils would be of concern for export (Table 3). The concentration criterion of 50 mg/kg of lead was selected because leachability, one of the primary concerns for off-Site disposal and waste characterization, is analyzed using a method with a 10 times dilution. Since the hazardous waste criteria, the soluble threshold limit concentration (STLC), is 5 milligrams per liter (mg/ℓ) for lead and the dilution factor is 10, a sample of total lead below 50 mg/kg could not leach at concentrations above 5 mg/ℓ. None of the soil samples contained VOCs above their respective reporting limits. Copies of the laboratory analytical reports and chain of custody documentation are included in Appendix B.

10.2. Soil Remediation

Based on the analytical results of the 38 randomly located samples, Ninyo & Moore personnel selectively excavated soil from the eight locations where soil samples contained lead concentrations greater than 50 mg/kg and/or detectable concentrations of TPH. (Figure 5). Soil was excavated to a minimum of 6 inches below the depth where the sample was initially collected. The excavations were approximately 6-feet square centered on the initial soil sample location. Following excavation, three soil samples were collected from the bottom of each excavation area and analyzed for TPH and total lead.

Following excavation, 24 confirmation soil samples were collected, three from each of the eight locations and analyzed for TPH and total lead to document that impacted soils had been removed (Table 4, Figure 5). Based on analytical data, two of the eight excavated areas had to be further excavated and re-sampled to confirm impacted soils had been adequately removed. At location B21, confirmation sample S21-CON-1 contained TPH at a concentra-

tion of 53 mg/kg; therefore the area of the failing sample was further excavated and another confirmation sample, S21-CON-4 was collected and analyzed for TPH. The confirmation sample did not contain TPH at a concentration above the reporting limit. At location B9, sample S9-CON-1 contained lead at a concentration of 150 mg/kg; therefore the area of the failing sample was further excavated and confirmation sample, S-9 (4) was collected and analyzed for lead. The confirmation sample contained lead, but at a concentration less than 50 mg/kg. Copies of the laboratory analytical reports and chain of custody documentation are included in Appendix B.

Soil excavated from the eight locations was temporarily stockpiled on Site, and underlain and covered by Visqueen® plastic sheeting. Stockpile characterization samples were collected and analyzed, in general accordance with the DEH Site Assessment and Mitigation (SAM) Manual (DEH, 2004) and the landfill requirements, for soil profiling and disposal. On August 10, 2004 the approximately 40 cy of soil generated from the additional excavation/remediation of the eight areas impacted with TPH and lead were profiled as non-hazardous waste and transported under manifest to the Otay Landfill. Copies of the soil profile documentation and non-hazardous waste manifests are included in Appendix C.

Following remediation of the eight areas, Site grading excavation, observations, monitoring, and documentation of the soils in these areas resumed and was conducted based on our soil excavation and monitoring protocols, as discussed in section 9 of this report. .

10.3. Underground Storage Tank Assessment and Remediation (Aztec Bowl Property)

10.3.1. UST Discovery

During the Site grading activities for the week of June 28, 2004, a UST was discovered on the parcel that was previously operated as a gasoline service station and Pacific Telephone and Telegraph service building (4356 30th Street). In March 2004, Ninyo & Moore personnel conducted a geophysical survey of a portion of the Site during which

indications of USTs were not identified. However, the UST appears to have been located south of the geophysical survey area.

The UST was found at a depth of approximately 3 feet bgs, having approximate dimensions of 36 inches in diameter, and 4 to 5 feet in length. The steel tank was estimated to have a 500-gallon capacity, and contained a fluid of unknown type and quantity at the time of removal. Permits to remove the UST were submitted to the San Diego Fire Department (SDFD) and the DEH on August 6, 2004. The permits were approved by the SDFD on August 25, 2004 and by the DEH on August 18, 2004 (Appendix D).

10.3.2. UST Removal and Soil Sampling

On August 26, 2004, UST removal activities were conducted at the Site. Although the tank was originally buried at a depth of approximately 3 feet bgs; following Site grading activities in which the soil around the UST was removed, the ground surface was lowered approximately 5 feet below the original grade so that at the time of the tank cleaning, the UST was exposed at surface grade. Based on field observations, the tank appeared to be in generally good condition, without significant pitting or holes.

Under the observation of Mr. Ewan Moffat, case specialist for the DEH, and Mr. Eric Cadew of the SDFD, EFR Environmental Services (EFR) removed the remaining fluid, approximately 80 gallons, from the tank, which appeared to be black waste oil. After removal of the fluid from the UST, the tank was cleaned using a high-pressure, high-temperature rinse, wash with Liquinox® detergent, and a final rinse. The wash and rinse water was vacuumed from the tank into EFR's vacuum truck. The UST was loaded onto a truck operated by Fred North Construction and was transported to Pacific Steel of National City, California, for recycling. The waste oil and tank rinsate were transported by EFR to Dome Rock Industries in Quartzite, Arizona, for treatment. Copies of the DEH UST closure report, certification of destruction of the tank, and non-hazardous waste manifest for the oil/water are included in Appendix F.

Following removal of the UST, at the direction of Mr. Moffat, a soil sample was collected in the two areas that corresponded to each end of the former UST. The samples were labeled T1N-6' and T1S-6' to indicate the soil samples from the north and south ends of the tank, respectively, at a depth of 6 feet below original ground surface (i.e., 1-foot below the bottom of the tank). The soil samples were analyzed for TPH carbon chain by USEPA Method 8015M and total recoverable petroleum hydrocarbons (TRPH) by USEPA Method 418.1. The sample containing the highest TPH concentration, (T1N-6') was additionally analyzed for VOCs by USEPA Method 8260B, for polynuclear aromatic hydrocarbons (PAHs) by USEPA Method 8270C, for Title 22 metals by USEPA Methods 6010B and 7471A, and for polychlorinated biphenyls (PCBs) by USEPA Method 8082.

10.3.3. Analytical Results

Laboratory analytical results indicated that sample T1N-6' contained TPH at a concentration of 16 mg/kg in the carbon range C_{23} to C_{44} (heavy oils) and TRPH at a concentration of 15 mg/kg (Figure 6, Table 5). The sample T1S-6' contained TRPH at a concentration of 24 mg/kg, but did not contain detectable concentrations of TPH. Soil sample T1N-6' did not contain concentrations of VOCs, PAHs, or PCBs above their respective reporting limits. Title 22 metals were detected, but at concentrations that are within background levels of metals in soils (Bradford et al, 1996). Appendix F contains the laboratory analytical report and chain of custody documentation associated with the sampling event.

10.3.4. Soil Remediation

Since the higher concentration of TPH was detected in soil sample T1N-6', on August 31, 2004, soil remediation by excavation of impacted soils was conducted under the Post Tank Removal Workplan submitted as part of the UST closure application included in Appendix D. Approximately 5 cy of soil was excavated from the vicinity of sampling location T1N-6'. The soil was placed directly into a dump truck for transport to a dis-

posal facility. The soil was transported to Otay Landfill under a non-hazardous waste manifest on August 31, 2004. Appendix G includes the non-hazardous waste manifest for the soil disposal.

After excavation, three confirmation soil samples, T1-2.0, T2-2.0, and T3-2.0 were collected at depths of approximately 2 feet below sample T1N-6', corresponding to approximately 8 feet below the original ground surface. The soil samples were analyzed for TPH by carbon range by USEPA Method 8015M. TPH was not detected in the confirmation soil samples above the reporting limit of 5 mg/kg.

10.4. Burn Pit Assessment and Remediation (Heilig Meyers Property, 2930 El Cajon Boulevard)

During grading of the southern portion of the Site, representatives of Ninyo & Moore and Brian F. Smith Associates observed a localized area of debris consisting primarily of ash, glass, ceramic, and metal, suggestive of a former burn pit. Upon discovery of the debris, the excavation contractor was redirected to work in another area of the Site and the burn pit area was marked with caution tape. The size of the burn pit was estimated to be approximately 4 feet wide by 4 feet long by approximately 2 feet deep. The burn pit was located immediately south of the telecommunications and dry utility trench, approximately halfway between 30th Street and Kansas Street (Figure 7).

10.4.1. Initial Burn Pit Sampling

On September 14, 2004, three burn pit samples, Pit 1-1, -2, and -3, were collected to assess the potential presence of COPCs. The soil samples were analyzed for PAHs by USEPA Method 8270C and for Title 22 metals by USEPA Methods 6010B/7471A. The analytical results indicated that sample Pit 1-1 contained total chromium, lead, and zinc concentrations that exceeded 10 times their respective STLC, suggesting leachability would be a potential concern (Table 6). The concentrations of lead and chromium in the sample were above the residential Preliminary Remediation Goals (PRGs). Metals in the other two samples were not detected at concentrations that would suggest leachability

would be of concern. Concentrations of PAHs were not detected above the reporting limit in the three samples.

10.4.2. Regulatory Agency Oversight

Because the burn pit was located within the City of San Diego, the planned remedial activities were completed under the purview of the City of San Diego Solid Waste Local Enforcement Agency (LEA). Ninyo & Moore personnel prepared a Remedial Action Work Plan and Community Health and Safety Plan for the planned burn pit remediation activities. The work plan and community health and safety plan were approved by Ms. Rebecca Lafreniere of the LEA in a letter dated September 22, 2004. Copies of the Remedial Action Work Plan, Community Health and Safety Plan, and approval letter from the LEA are included in Appendix H.

10.4.3. Burn Pit Remediation

On September 23, 2004, Ninyo & Moore documented the removal of approximately 11 tons of burn material and soil impacted with elevated concentrations of lead, chromium, and zinc. The excavation was approximately 6 feet wide by 6 feet long and 5 feet deep (Figure 7). During the excavation activities, dust emissions were monitored using a MiniRae dust monitor. Concentrations of airborne dust did not exceed the threshold value of 2 milligrams per cubic meter during the field activities, stated in the SHSP. The excavated soil was temporarily stockpiled on and covered with Visqueen® plastic sheeting. The equipment used to excavate the soil was decontaminated using a non-phosphate wash solution followed by a tap water rinse. The rinsate was containerized in a 55 gallon drum.

10.4.4. Confirmation Soil Sampling and Results

After excavating the observed extent of the burn pit, six confirmation soil samples were collected from the bottom and sidewalls of the excavation for field screening of lead using an X-ray fluorescence spectrometer. The results of the field screening indicated that

lead was not detected in the soil samples at concentrations above 48 mg/kg. Confirmation soil samples were collected from the same locations as the field screening samples and submitted for analysis of PAHs by USEPA Method 8310 and for Title 22 metals by USEPA Methods 6010B/7471A. The analytical results indicated that metals were not detected at concentrations that would suggest leachability would be of concern (10 times their respective STLC) and PAHs were not detected at concentrations at or above the reporting limit of 50 micrograms per kilogram (ug/kg) (Table 6). Copies of the analytical reports and chain of custody documentation are included in Appendix I.

10.4.5. Waste Disposal

Four samples were collected from the stockpiled soil and debris to characterize the material for off-Site disposal. The analytical results and profile information were submitted for review and acceptance into the Otay Landfill. The soil was transported to the Otay Landfill on November 2, 2004 under a non-hazardous waste manifest. The drum containing the decontamination water was transported to Dome Rock Industries of Quartzite, Arizona by EFR. Copies of the manifests are included in Appendix J.

10.5. Underground Storage Tank Assessment (Heilig Meyers Property, 4327 Kansas Street)

10.5.1. UST Discovery

During the Site grading activities, a UST was discovered on the parcel that formerly operated as a printing shop and subsequently a parking lot (4327 Kansas Street, APN 446-162-11-00). The UST was encountered at a depth of approximately 4 feet bgs and was approximately 36 inches in diameter and 3 to 4 feet long. The tank was steel construction and may have been used to store fuel oil for heating.

10.5.2. UST Removal and Initial Assessment

On November 2, 2004, under the observation of Ninyo & Moore personnel, the UST was removed from the Site by Fred North Construction and EFR. The UST was re-

moved under permits issued by the DEH and SDFD (Appendix K). Representatives of the DEH and SDFD were on Site during the UST removal to document the proper decontamination of the UST, as well as the condition of the UST and surrounding soil. The UST certificate of disposal and rinsate disposal documentation are included as Appendix K. A copy of the UST System Closure Report is also included in Appendix K.

At the direction of the DEH, one soil sample was collected immediately below each end of the former tank, and analyzed for TPH as gasoline (TPH-G) and as diesel (TPH-D) by DHS Leaking Underground Fuel Tank Method as well as TRPH by USEPA Method 418.1M.. Analytical results indicated that TPH-G was detected at concentrations of 39 and 44 mg/kg at the east and west ends of the former tank, respectively. TPH-D concentrations were 260 and 140 mg/kg at the east and west ends of the tank, respectively. The east and west end soil samples also contained TRPH at concentrations of 610 and 110 mg/kg, respectively (Figure 8, Table 7). The laboratory report and chain of custody documentation are included in Appendix L.

The soil sample from the east end of the former tank was additionally analyzed for benzene, toluene, ethylbenzene, xylenes (BTEX), naphthalene, and oxygenates by USEPA Method 8260B. Ethylbenzene and naphthalene were detected at concentrations of 8.9 and 180 ug/kg, respectively. Because petroleum hydrocarbons and VOCs were detected in the UST closure soil samples, Ninyo & Moore personnel implemented the post-tank removal work plan that we previously prepared and was pre-approved by the DEH (Appendix K). During the post-tank removal assessment, approximately 50 cy of soil was removed from the area of the former UST and temporarily stockpiled on Site. The excavation was approximately 12 feet by 12 feet by 7 feet deep.

Following excavation, four soil samples were collected from the excavation side walls and analyzed for TPH-G and TPH-D. Analytical results indicated TPH-G was detected at concentrations ranging from 8.5 to 190 mg/kg, and TPH-D was detected at concentrations ranging from 140 to 5,400 mg/kg (Figure 8, Table 7). It was recommended that

additional soil remediation be conducted based on the analytical results indicating the presence of TPH in the soil samples following the implementation of the post tank removal assessment.

10.5.3. Soil Remediation by Excavation

Because TPH impacted soils were still present in association with the UST release, Ninyo and Moore personnel prepared a work plan and community health and safety plan to conduct a subsurface assessment and to remove the impacted soils associated with the release. The plans were reviewed and approved by the DEH. A copy of the work plan and community health and safety plan and approvals are included as Appendix M.

Soil remediation activities under the approved work plan were conducted from January 31, to February 7, 2005. The existing excavation was enlarged horizontally and vertically in an effort to remove the impacted soils from the release area. As soil was removed, soil samples were collected from the excavation sidewalls and floor and field screening was conducted using a PID. When PID readings were below 10 parts per million (ppm), confirmation soil samples were collected and submitted to a state-certified laboratory for analysis of TPH-G, TPH-D, BTEX, and naphthalene to document impacted soils were removed.

10.5.4. Confirmation Sampling

A total of 14 sidewall samples were collected from the excavation as post-excavation confirmation samples. As per the work plan, one soil sample was collected for every 10 linear feet of sidewall (14 samples, including two samples that failed), and one soil sample was collected for every 100 square feet of excavation floor (nine samples).

Soil sample analytical results indicated TPH-D was initially detected in two soil samples, WW1-10' and WW2-12', collected from the western excavation wall at approximate depths of 10 to 12 feet bgs; at concentrations of 16 and 860 respectively. TPH-G was not detected in these two samples at concentrations above the reporting limit. The west-

ern excavation wall was additionally excavated another approximately 3 to 4 feet to the west and re-sampled. The three additional west wall confirmation samples indicated that TPH-G, TPH-D, BTEX, and naphthalene were not detected above the reporting limit.

Of the three soil samples collected from the southern excavation sidewall one sample SW2-10, contained TPH-D at a concentration of 750 mg/kg. This same sample contained TPH in the gasoline range; however, the analytical report indicated that the chromatogram did not match the gasoline standard; therefore, the TPH reported in the gasoline range is not believed to be gasoline. The sample did not contain BTEX or naphthalene above the respective reporting limits. The other two samples collected along the southern excavation sidewall did not contain TPH-G, TPH-D, BTEX, or naphthalene at concentrations above their respective reporting limits. Because several utilities were known to exist south of the excavation, including a high-pressure gas main and a fiber optic communications line, additional excavation along the southern side wall (and to depths greater than approximately 15 feet bgs) could not be accomplished. Soil samples collected from the eastern and northern excavation side walls did not contain TPH-G, TPH-D, BTEX, or naphthalene at concentrations above their respective reporting limits.

One excavation floor sample, B7-17', collected by potholing in the center of the excavation, contained TPH-D at a concentration of 520 mg/kg. This same sample reported TPH in the gasoline range; however, the analytical report indicated the chromatogram did not match the gasoline standard; therefore, the TPH reported in the gasoline range is not believed to be gasoline. The sample did not contain BTEX or naphthalene above their respective reporting limits. The other eight confirmation soil samples collected from the excavation floor at depths of 10 to 15 feet bgs did not contain TPH-G, TPH-D, BTEX, or naphthalene above their respective reporting limits. As indicated above, the excavation floor could not be deepened due to the presence of several utilities to the south. Table 8 summarizes the confirmation soil sample analytical results associated with the former UST and Figure 9 presents the locations of confirmation samples and

TPH-G and TPH-D analytical results. The laboratory reports and chain of custody documentation are included in Appendix N.

Soil associated with the UST assessment and remediation by excavation was temporarily stockpiled adjacent to the excavation and was placed on and covered by Visqueen® plastic sheeting. The final dimensions of the excavation were approximately 30 feet by 30 feet by 15 feet deep. The excavation was subsequently backfilled by the contractor subsequent to Ninyo & Moore personnel leaving the Site.

10.5.5. Off-Site Soil Disposal

Soil temporarily stockpiled from the UST assessment and remediation activities was sampled and profiled for acceptance into the Otay Landfill. From February 3 to 9, 2005, the soil was transported off Site under manifest. A total of 77 truck loads (1,986 tons of soil) was disposed of at the Otay Landfill (Table 9). Copies of the manifests are included in Appendix O.

11. SUMMARY AND CONCLUSIONS

Based on results of the assessment and remediation activities conducted at the Site, the following summary and conclusions are provided at this time.

- From July 2004 to February 2005, Ninyo & Moore personnel provided on-call environmental field services associated with Site grading including monitoring, characterizing, and documenting soils during excavation and export from the Site. As part of the grading activities, 38 randomly located soil samples were collected, from depths of 0.1 to 3.9 feet to generally chemically characterize the soils prior to their excavation and export from the Site. Eight of the 38 locations initially sampled contained TPH-and/or elevated lead concentrations. and were subsequently remediated by excavation.. The TPH and lead impacted soils at the eight locations were successfully remediated by excavation. In addition to the soil export associated with the on going grading activities, approximately 68 tons of TPH and lead-impacted soil was excavated in association with remediating the eight areas and disposed of at the Otay Landfill as non-hazardous waste.

- During the Site grading activities, a UST was discovered along the eastern portion of the property, on the parcel that previously operated as a gasoline service station and Pacific Tele-

phone and Telegraph service building (Aztec Bowl, 4356 30th Street). The UST was removed from the Site under permits issued by the DEH and SDFD. Initial soil samples associated with the tank removal contained relatively low levels of TPH and TRPH. Since TPH was detected remediation by excavation of impacted soils was conducted under the Post Tank Removal Workplan submitted as part of the UST closure application. After excavation, confirmation soil samples indicated TPH was not detected in the samples above the reporting limit of 5 mg/kg. The approximately 8.5 tons of soil excavated in association with the UST removal and post tank removal excavation was disposed of at the Otay Landfill as non-hazardous TPH-impacted soil.

- During grading of the southern portion of the Site, a burn pit was discovered containing debris consisting primarily of ash, glass, ceramic, and metal. Initial sampling of the burn pit indicated one sample contained total chromium, lead, and zinc concentrations greater than 10 times their respective STLCs and above their respective residential PRGs. Based on analytical data and field observations, the burn pit area was excavated and confirmation samples were collected from the excavation floor and side walls. Metals were not detected at concentrations greater than 10 times their respective STLCs or residential PRGs, and PAHs were not detected at concentrations at or above the reporting limit of 50 ug/kg. Approximately 10.5 tons of non-hazardous metal-impacted soil and burned materials excavated from the burn pit was disposed of as non-hazardous waste at the Otay Landfill.

- During the Site grading activities, a UST was discovered on the parcel that formerly operated as a printing shop and subsequently a parking lot (Heilig Meyers, 4327 Kansas Street). The tank was removed from the Site under permits issued by the DEH and SDFD. Initial soil sampling associated with the tank removal indicated the presence of TPH-G, TPH-D, and TRPH. Ethylbenzene and naphthalene were also detected in the one sample analyzed. Because petroleum hydrocarbons and VOCs were detected in the UST closure soil samples, the post-tank removal work plan was implemented and additional soil was excavated from the former UST excavation. Following excavation, soil samples collected from the excavation side walls contained TPH-G and TPH-D.

- Additional soil remediation by excavation was conducted and 23 confirmation soil samples were collected from the excavation. With the exception of two samples, petroleum hydrocarbon impacted soils associated with this former tank were successfully removed from the Site. One soil sample along the southern wall and another soil sample from the excavation floor contained TPH-D at concentration of 750 and 520 mg/kg, respectively. Because several utilities were known to exist south of the excavation, including a high-pressure gas main and a fiber optic communication line, additional excavation along the southern side wall and to greater depths could not be accomplished. Approximately 1,986 tons of non-hazardous petroleum hydrocarbon impacted soil was removed in the vicinity of the former UST and disposed of at the Otay Landfill.

12. RECOMMENDATIONS

Based on the completion of the soil assessment and remediation activities conducted at the Site in association with the Site grading, UST assessments and remediation, and the burn pit assessment and remediation, it is our opinion that the DEH should issue a Certificate of Completion in accordance with Cal. Health & Safety Code Sections 25264(b) and (c) and 33459.3.

13. LIMITATIONS

The environmental services described in this report have been conducted in general accordance with current regulatory guidelines and the standard-of-care exercised by environmental consultants performing similar work in the project area. No warranty, expressed or implied, is made regarding the professional opinions presented in this report. Variations in Site conditions may exist and conditions not observed or described in this report may be encountered during subsequent activities. Please also note that this study did not include an evaluation of geotechnical conditions or potential geologic hazards.

Ninyo & Moore's opinions and recommendations regarding environmental conditions, as presented in this report, are based on limited subsurface assessment and chemical analysis as well as data presented by others in the referenced documents. The samples collected and used for testing, and the observations made, are believed to be representative of the area(s) evaluated; however, conditions can vary significantly between sampling locations. Variations in soil and/or groundwater conditions will exist beyond the points explored in this evaluation.

The environmental interpretations and opinions contained in this report are based on the results of laboratory tests and analyses intended to detect the presence and concentration of specific chemical or physical constituents in samples collected from the subject Site. The testing and analyses have been conducted by an independent laboratory which is certified by the State of California to conduct such tests. Ninyo & Moore has no involvement in, or control over, such testing and analysis. Ninyo & Moore, therefore, disclaims responsibility for any inaccuracy in such laboratory results.

Our conclusions, recommendations, and opinions are based on an analysis of the observed Site conditions. It should be understood that the conditions of a Site could change with time as a result of natural processes or the activities of man at the subject Site or nearby Sites. In addition, changes to the applicable laws, regulations, codes, and standards of practice may occur due to government action or the broadening of knowledge. The findings of this report may, therefore, be invalidated over time, in part or in whole, by changes over which Ninyo & Moore has no control.

This document is intended to be used only in its entirety. No portion of the document, by itself, is designed to completely represent any aspect of the project described herein. Ninyo & Moore should be contacted if the reader requires any additional information, or has questions regarding content, interpretations presented, or completeness of this document.

This report is intended exclusively for use by the client. Any use or reuse of the findings, conclusions, and/or recommendations of this report by parties other than the client is undertaken at said parties' sole risk.

September 27, 2006
Project No. 105187006

Mr. Ewan Moffat
County of San Diego
Department of Environmental Health
1255 Imperial Avenue, Suite 300
San Diego, California 92101

Subject: Response to Preliminary Comments
Closure Report
Renaissance at North Park
30th Street and El Cajon Boulevard
San Diego, California

Dear Mr. Moffat:

Ninyo & Moore is pleased to submit this response to County of San Diego, Department of Environmental Health (DEH) comments to the document entitled "Closure Report, Renaissance at North Park, 30th Street and El Cajon Boulevard, San Diego, California," dated November 15, 2005. We received your comments to the closure report in a January 18, 2006 email, which outlined additional information requested by DEH to consider regulatory closure for the project. The email is attached as Appendix A.

1. As correctly stated in the DEH email, Ninyo & Moore was not onsite during the removal of the upper 4 to 5 feet of soil at the northern portion of the site because the necessity to monitor/sample this soil was not communicated to the grading subcontractor (Mountain Movers) by the General Contractor (Sun Country Builders). Ninyo & Moore personnel contacted the General Contractor on July 2, 2004; however, by that time, soil generated from grading activities had already been removed from the site between June 28 and July 2, 2004, and transported to an industrial facility at Boston Avenue and Camino de la Plaza, immediately adjacent to the United States-Mexico border, in San Ysidro, California (Figure 1). The location of the disposition of the soil was provided to Ninyo & Moore by Daryl McFarland of Sun

Country Builders in a July 12, 2006 e-mail (Appendix B). Ninyo & Moore is not aware of any characterization sampling conducted prior to transportation and off site disposal of this soil.

2. Please see Figure 2 for the approximate soil gas sample location points and results from the soil vapor survey conducted in March 2003 by Southern California Soil and Testing (SCST). The SCST soil gas sample points were superimposed onto existing Figure 2 of the subject closure report. Because the soil vapor data superceded the removal of the upper 4 to 5 feet of soil in the northern portion of the site, these results should provide some level of comfort that the excavated soil was probably suitable for export and off-site reuse.

3. Please see Figures 3, 4, and 5 for a plan view and cross sections related to the remediation of the burn pit on the Heilig Meyers property.

4. Please see Figures 6, 7, 8, and 9 for a plan view and cross sections related to the remediation of the Kansas Street underground storage tank (UST) on the Heilig Meyers property.

5. Soil sample, B7-17', was collected from the floor of the Kansas Street UST excavation by potholing near the center of the excavation to a depth of approximately 17 feet below ground surface (bgs). During excavation activities, it was apparent based on visual observations and screening of the excavated soil using a photoionization detector that total petroleum hydrocarbon- (TPH) impacted soil remained near the center of the excavation to a depth greater than that which could be reached using a track-mounted excavator. Since the excavation walls had reached the practical lateral limits of excavation due to the presence of large soil piles to the north and west, and live utilities to the south and east, additional soil removal in the center of the excavation was not practical. Also, since benzene, toluene, ethylbenzene, and xylenes (BTEX) and naphthalene were not detected in any of the confirmation soil samples, health risk was not a concern. TPH-impacted soil that could not be removed with the on site equipment was left in place, and the excavation was subsequently backfilled.

   DEH indicated in the subject email that a boring or further excavation should be conducted to vertically define the extent of TPH-impacted soil based on the presence of TPH as gasoline and diesel (TPH-G&D) at concentrations of 20 and 250 milligrams per kilogram (mg/kg), respec-

tively, at a depth of approximately 17 feet bgs. The purpose of the DEH-requested additional work is believed to be to estimate the amount of TPH impacted soil left in place, and to evaluate the potential for it to adversely impact groundwater.

It is our opinion that additional vertical delineation of the suspected amount of TPH impacted soil in the area of confirmation soil sample B7-17' is not warranted. This is because the estimated volume of TPH-impacted soil is expected to be less than 100 cubic yards, given that the other eight confirmation samples collected from the excavation floor did not contain detectable concentrations of TPH-G, TPH-D, BTEX, or naphthalene (i.e., there is no health risk from vapors), Figure 6.

We also reviewed Table 5-8 "Petroleum Residual NAPL Saturation Based on Soil Type in Sedimentary Environments" of the current Site Assessment and Mitigation (SAM) manual (page 5-59) and conclude that the concentrations of 20 mg/kg of TPH-G and 520 mg/kg of TPH-D do not exceed the residual saturation of the Lindavista Formation, in which the release occurred. The Lindavista Formation is primarily comprised of sandstone and conglomerate with a sandy matrix. Therefore, the soil type is interpreted to be a combination of medium to coarse sand and sandy gravel based on Table 5-8 of the SAM manual. As indicated on Table 5-8, the residual saturation concentrations of gasoline in medium to coarse sand and sandy gravel are 2,300 and 1,500 mg/kg, respectively; and for diesel are 4,400 and 2,800 mg/kg, respectively. Therefore, the residual concentrations of TPH-G and TPH-D (20 and 520 mg/kg, respectively) in confirmation sample B7-17' are well below the residual saturation levels for the soil types in which TPH occurs. This information suggests that the potential for migration of TPH to groundwater (estimated depth approximately 80 feet bgs) is negligible. In addition, the sample which contained TPH-G and TPH-D did not contain detectable levels of BTEX or naphthalene, therefore there is no vapor migration risk based on these results.

Based on the absence of volatile organic compounds in sample B7-17', relatively low TPH-G & D concentrations in the sample, the fact that the soil will be covered by impervious surfaces (buildings and parking lots), and the depth to groundwater, it is our opinion that the assumed relatively minor volume of TPH-impacted soil left in place does not pose a threat to groundwater which is

believed to occur at a depth greater than 80 feet bgs, or to future occupants of the site. Therefore, no further evaluation of the soil is warranted.

We trust that the presentation of the additional information requested by DEH will allow you to grant regulatory closure of this case. If you have any questions or comments regarding this letter, please contact the undersigned.

Sincerely,
NINYO & MOORE

W. Scott Snyder, P.G., HG.
Senior Hydrogeologist

Beth S. Abramson-Beck, P.G.
Principal Geologist

SB/WSS/BAB/gg

Distribution: (1) Addressee
(1) Mr. Ken Cluskey; Carter Reese & Associates
(1) Ms. Linda Beresford; Opper & Varco LLP

Attachments: Figure 1 – Soil Export Location Map
Figure 2 – Summary of Southern California Soil & Testing Soil Vapor Sample Analytical Results
Figure 3 – Burn Pit Sample Locations
Figure 4 – Cross Section A-A'
Figure 5 – Cross Section B-B'
Figure 6 – Kansas Street Soil Remediation Confirmation Sample Analytical Results
Figure 7 – Kansas Street Soil Remediation Excavation Sidewalls
Figure 8 – Cross Section A-A'
Figure 9 – Cross Section B-B'
Appendix A – Email Correspondence from Department of Environmental Health, dated January 18, 2006
Appendix B – Email Correspondence from Sun Country Builders, dated July 12, 2006

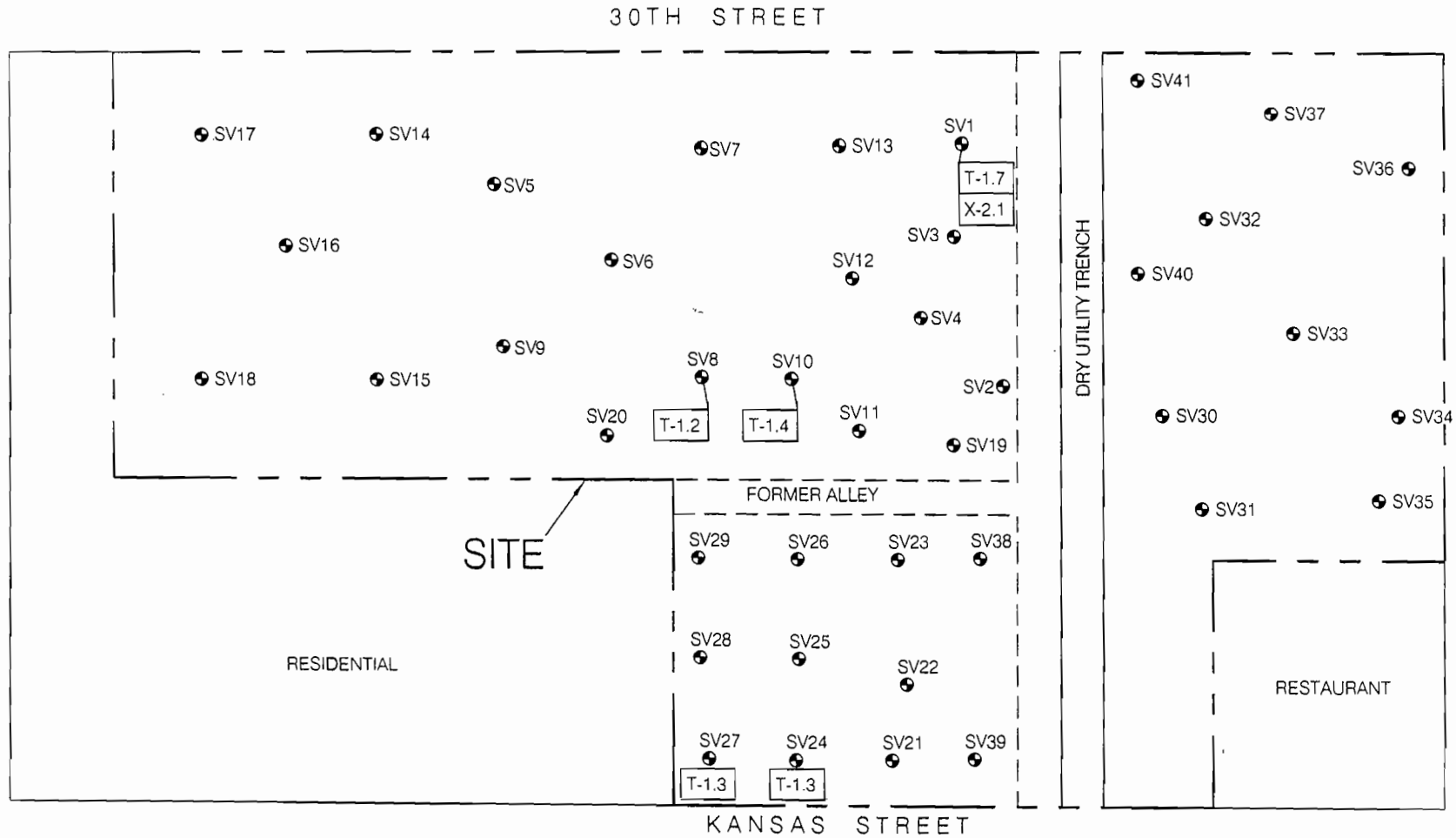
N

NOT TO SCALE

NOTE: ALL DIMENSIONS, DIRECTIONS AND LOCATIONS ARE APPROXIMATE.

REFERENCE: GOOGLE EARTH 2006.

Ninyo & Moore	SOIL EXPORT LOCATION MAP	FIGURE
PROJECT NO.	DATE	RENAISSANCE AT NORTH PARK 30TH STREET AND EL CAJON BOULEVARD SAN DIEGO, CALIFORNIA	1
105187006	9/06		



LEGEND	
SV41	Approximate location of soil vapor sample
T-1.7	Toluene soil vapor concentration, micrograms per liter (ug/L)
X-2.1	Xylenes soil vapor concentration, ug/L

NOTE: ALL DIMENSIONS, DIRECTIONS AND LOCATIONS ARE APPROXIMATE.
LOCATIONS APPROXIMATE BASED ON FIGURE 3 FROM SCST SOIL VAPOR REPORT DATED APRIL 18, 2003.
ONLY DETECTED COMPOUNDS SHOWN ON MAP. ALL OTHER RESULTS WERE BELOW THE REPORTING LIMIT.

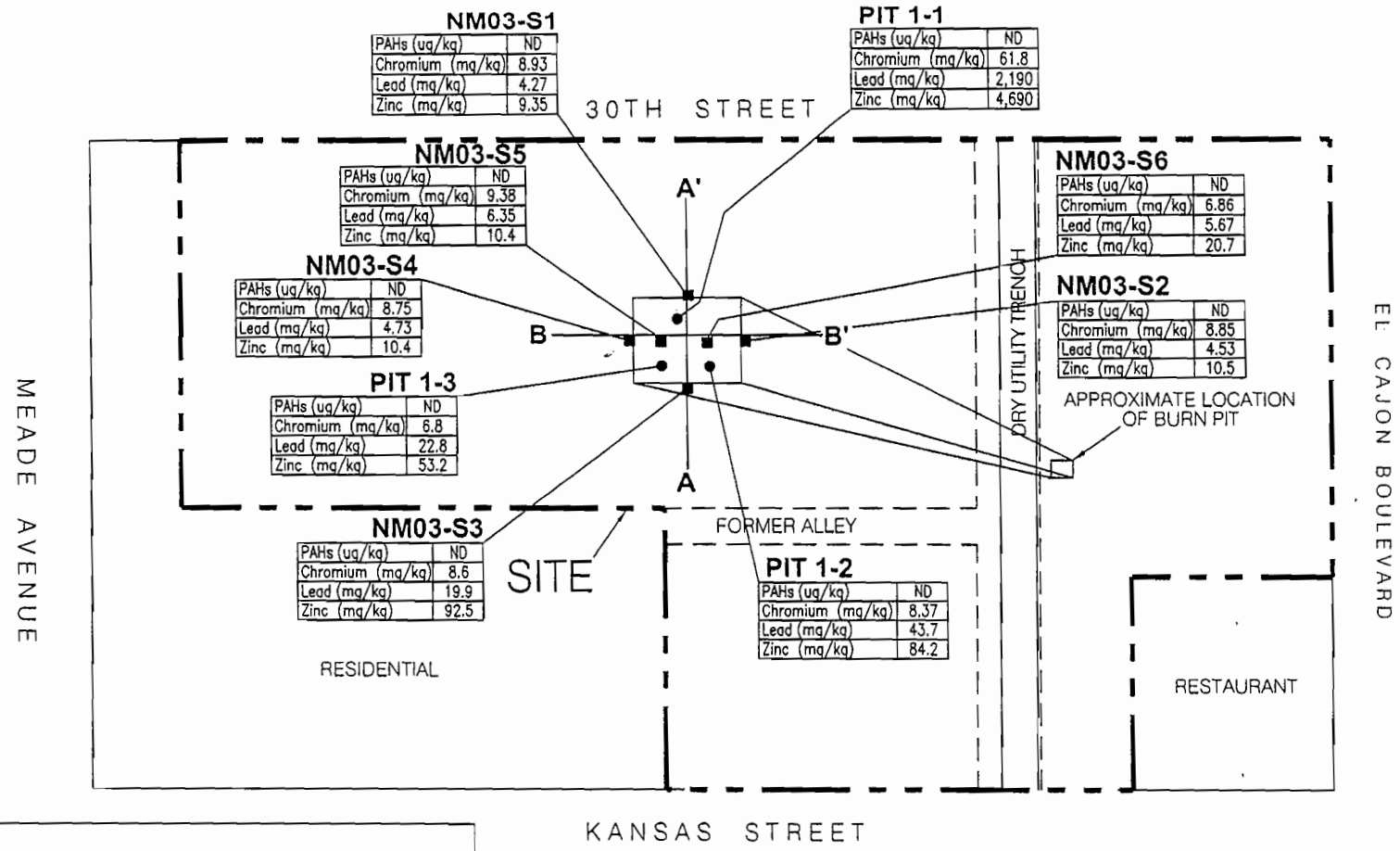
N

APPROXIMATE SCALE

0 80 160 FEET

Ninyo & Moore	SUMMARY OF SOUTHERN CALIFORNIA SOIL & TESTING SOIL VAPOR SAMPLE ANALYTICAL RESULTS	FIGURE
PROJECT NO. 105187006 / DATE 9/06	RENAISSANCE AT NORTH PARK 30TH STREET AND EL CAJON BOULEVARD SAN DIEGO, CALIFORNIA	2

105187006 fig1 9-06



LEGEND	
● PIT 1-3	Approximate pre-excavation sample location, 9/14/04
■ NM03-S6	Approximate confirmation soil sample location, 9/23/04
ND	Not detected at or above the reporting limit
PAHs	Polynuclear aromatic hydrocarbons
mg/kg	milligrams per kilogram
ug/kg	micrograms per kilogram

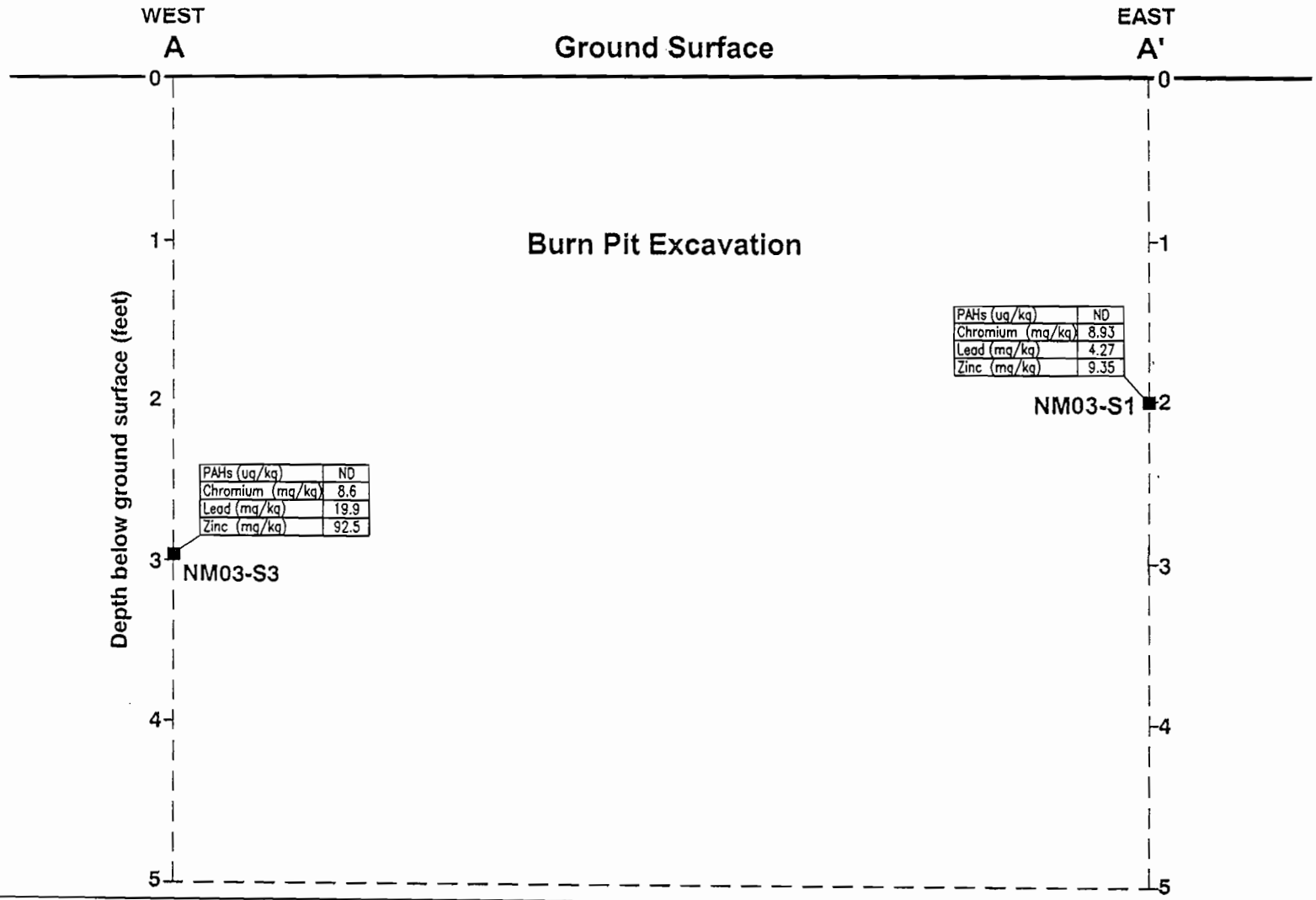
N

APPROXIMATE SCALE

0 80 160 FEET

Ninyo & Moore	BURN PIT SAMPLE LOCATIONS	FIGURE
PROJECT NO. 105187006 / DATE 9/06	RENAISSANCE AT NORTH PARK 30TH STREET AND EL CAJON BOULEVARD SAN DIEGO, CALIFORNIA	3

105187006 burn pit cont fig 3 8-06



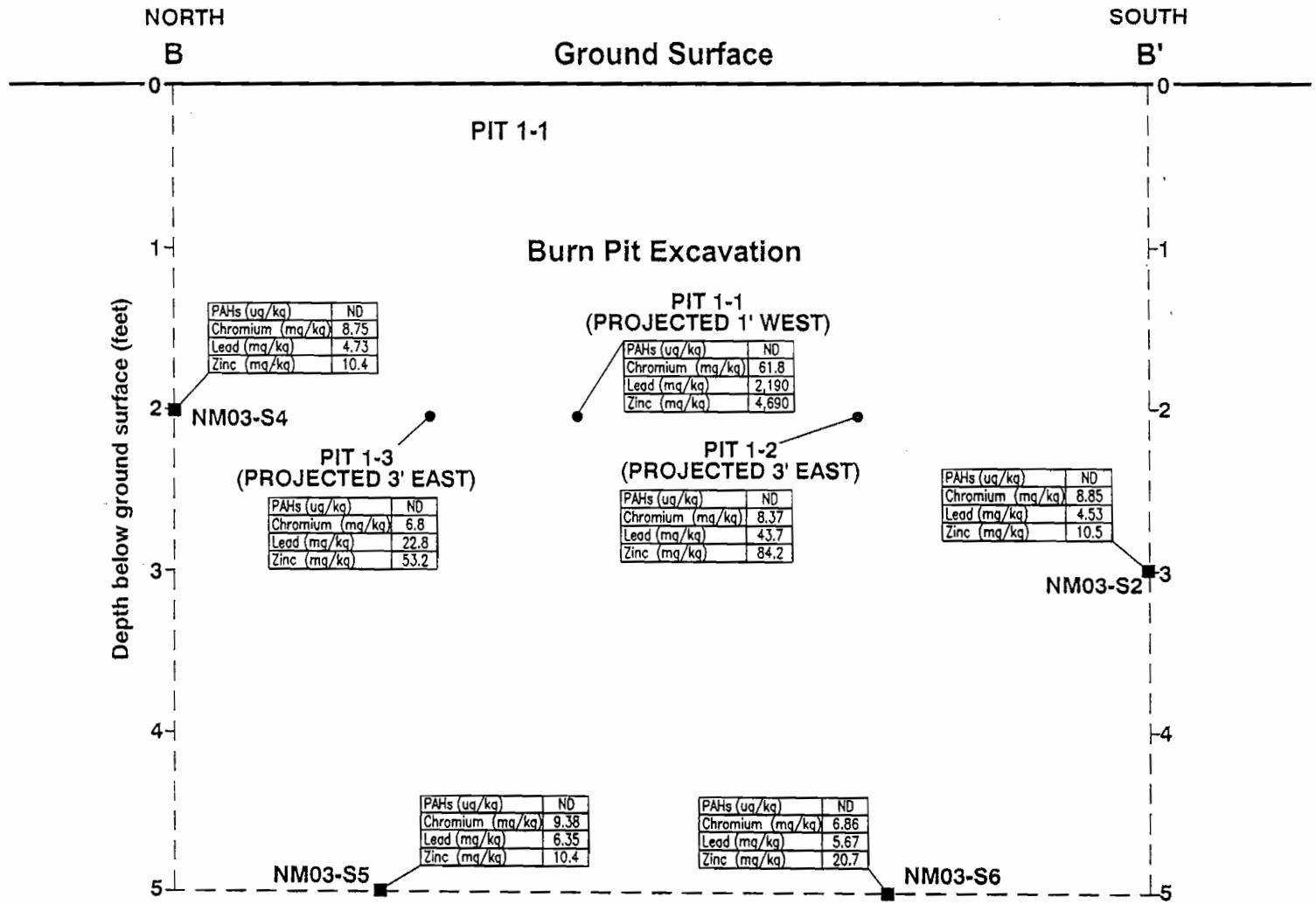
LEGEND			
NM03-S6			
■	Approximate confirmation soil sample location, 9/23/04		
ND	Not detected at or above the reporting limit	mg/kg	milligrams per kilogram
PAHs	Polynuclear aromatic hydrocarbons	ug/kg	micrograms per kilogram

APPROXIMATE SCALE

0 1 2 FEET

Ninyo & Moore	CROSS SECTION A-A'	FIGURE
PROJECT NO. 105187006 / DATE 9/06	RENAISSANCE AT NORTH PARK 30TH STREET AND EL CAJON BOULEVARD SAN DIEGO, CALIFORNIA	4

105187006 a-xsec fig 4 8-06



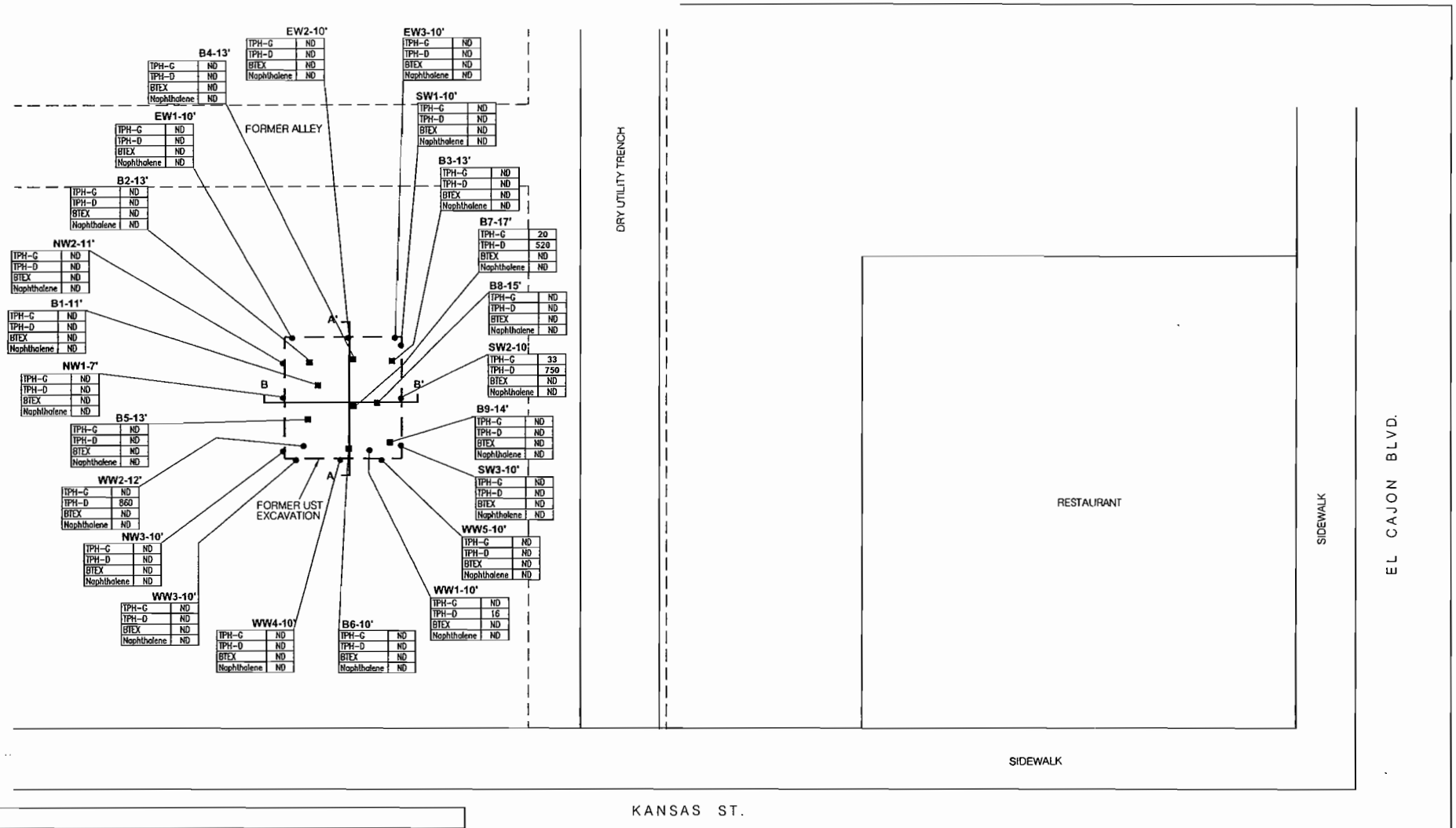
LEGEND			
NM03-S6			
■	Approximate soil sample location, 9/23/04	●	Approximate pre-excavation soil sample location, 9/14/04
ND	Not detected at or above the reporting limit	mg/kg	milligrams per kilogram
PAHs	Polynuclear aromatic hydrocarbons	ug/kg	micrograms per kilogram

APPROXIMATE SCALE

0 1 2 FEET

Ninyo & Moore	CROSS SECTION B-B'	FIGURE
PROJECT NO. 105187006 / DATE 9/06	RENAISSANCE AT NORTH PARK 30TH STREET AND EL CAJON BOULEVARD SAN DIEGO, CALIFORNIA	5

105187006 B-Xsec Fig 5



LEGEND

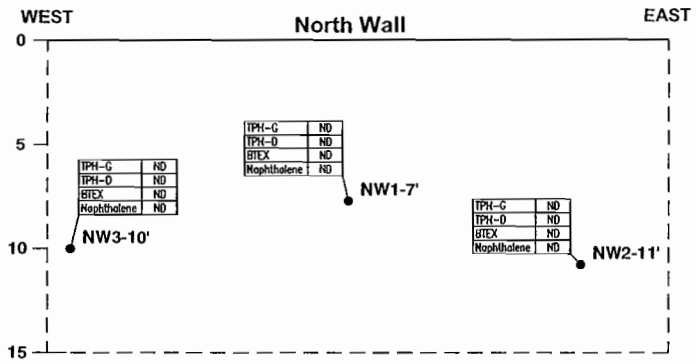
- ■**B6-10'** Approximate location of excavation floor confirmation soil sample, 1/31/05 to 2/07/05
- ●**WW4-10'** Approximate location of sidewall confirmation soil sample, 1/31/05 to 2/07/05
- TPH-G Total petroleum hydrocarbons as gasoline milligrams per kilogram (mg/kg)
- TPH-D Total petroleum hydrocarbons as diesel (mg/kg)
- ND Not detected at or above the reporting limit
- BTEX Benzene, toluene, ethylbenzene, xylenes
- B B' Cross section

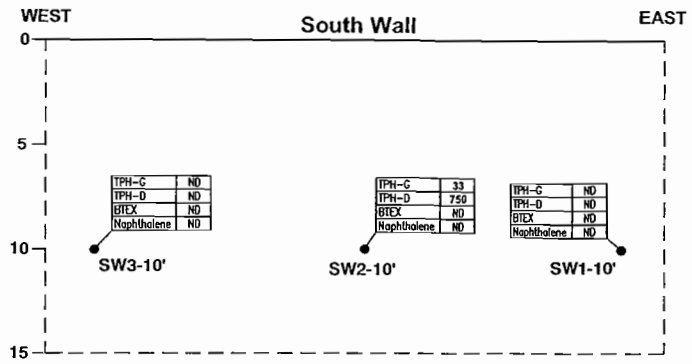
B6-10'
TPH-G ND — Sample ID
TPH-D ND
BTEX ND
Naphthalene ND
Analyte Result in mg/kg

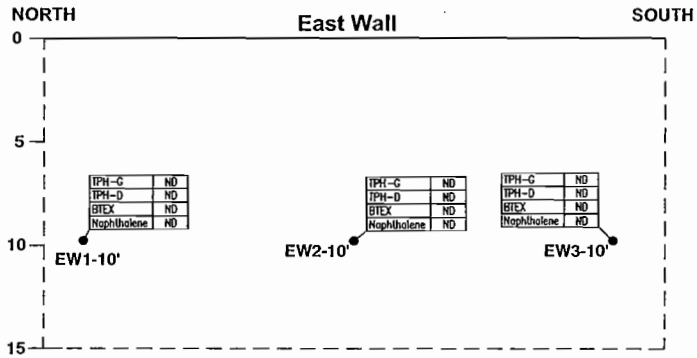
APPROXIMATE SCALE
0 20 40 FEET

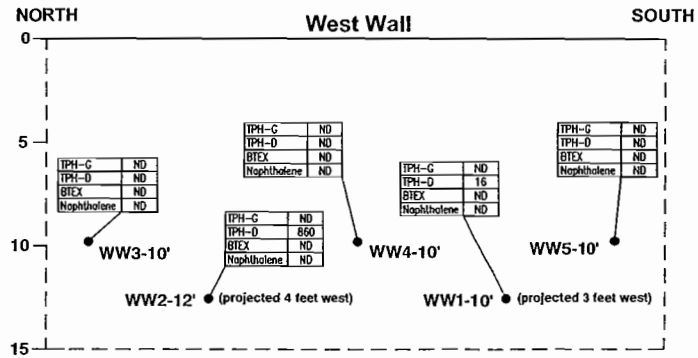
NOTE: ALL DIMENSIONS, DIRECTIONS AND LOCATIONS ARE APPROXIMATE

Ninyo & Moore	KANSAS STREET SOIL REMEDIATION CONFIRMATION SAMPLE ANALYTICAL RESULTS	FIGURE
PROJECT NO. 105187006 / DATE 9/06	RENAISSANCE AT NORTH PARK 30TH STREET AND EL CAJON BOULEVARD SAN DIEGO, CALIFORNIA	6









LEGEND

●WW4-10'	Approximate location of confirmation soil sample, 1/31/05 to 2/07/05
TPH-G	Total petroleum hydrocarbons as gasoline milligrams per kilogram (mg/kg)
TPH-D	Total petroleum hydrocarbons as diesel (mg/kg)
ND	Not detected at or above the reporting limit
BTEX	Benzene, toluene, ethylbenzene, xylenes

B6-10' ← Sample ID

TPH-G	ND
TPH-D	ND
BTEX	ND
Naphthalene	ND

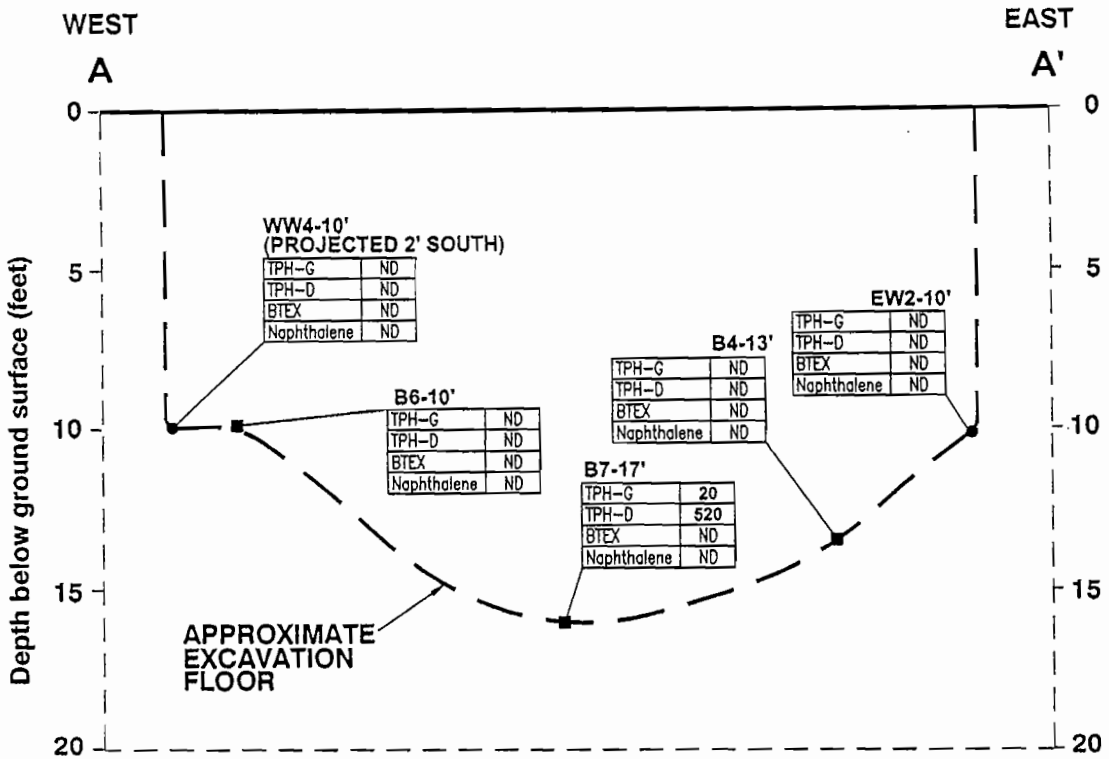
Analyte Result in mg/kg

APPROXIMATE SCALE

0 6 12 FEET

NOTE: ALL DIMENSIONS, DIRECTIONS AND LOCATIONS ARE APPROXIMATE

Ninyo & Moore	KANSAS STREET SOIL REMEDIATION EXCAVATION SIDEWALLS	FIGURE
PROJECT NO. 105187006 / DATE 9/06	RENAISSANCE AT NORTH PARK 30TH STREET AND EL CAJON BOULEVARD SAN DIEGO, CALIFORNIA	7



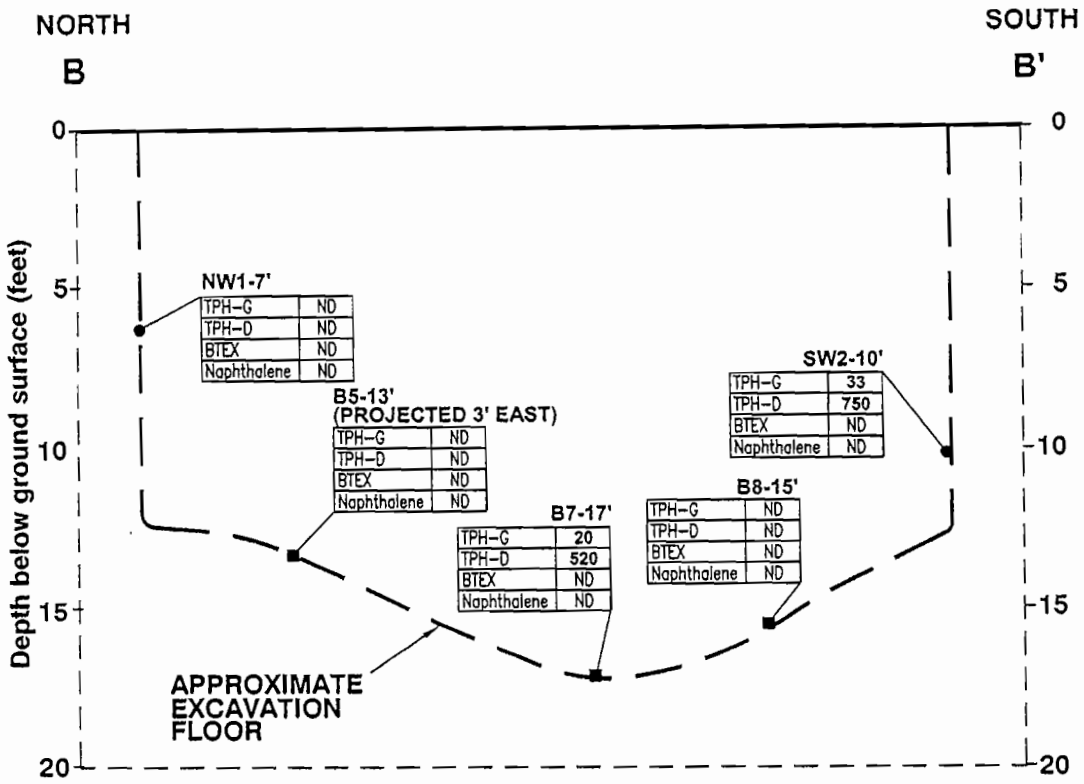
LEGEND	
■B7-17'	Approximate location of excavation floor confirmation soil sample, 1/31/05 to 2/07/05
●WW4-10'	Approximate location of sidewall confirmation soil sample, 1/31/05 to 2/07/05
TPH-G	Total petroleum hydrocarbons as gasoline milligrams per kilogram (mg/kg)
TPH-D	Total petroleum hydrocarbons as diesel (mg/kg)
ND	Not detected at or above the reporting limit
BTEX	Benzene, toluene, ethylbenzene, xylenes

APPROXIMATE SCALE

0 6 12 FEET

Ninyo & Moore	CROSS SECTION A-A'	FIGURE
PROJECT NO. 105187006 / DATE 9/06	RENAISSANCE AT NORTH PARK 30TH STREET AND EL CAJON BOULEVARD SAN DIEGO, CALIFORNIA	8

105187006 A-Xsec Fig 8 9-06



LEGEND	
■B8-15'	Approximate location of excavation floor confirmation soil sample, 1/31/05 to 2/07/05
●NW1-7'	Approximate location of sidewall confirmation soil sample, 1/31/05 to 2/07/05
TPH-G	Total petroleum hydrocarbons as gasoline milligrams per kilogram (mg/kg)
TPH-D	Total petroleum hydrocarbons as diesel (mg/kg)
ND	Not detected at or above the reporting limit
BTEX	Benzene, toluene, ethylbenzene, xylenes

APPROXIMATE SCALE

0 6 12 FEET

Ninyo & Moore	CROSS SECTION B-B'	FIGURE
PROJECT NO. 105187006 / DATE 9/06	RENAISSANCE AT NORTH PARK 30TH STREET AND EL CAJON BOULEVARD SAN DIEGO, CALIFORNIA	9

105187006 B-Xsec Fig 9 9-06

APPENDIX A

EMAIL CORRESPONDENCE FROM DEPARTMENT OF ENVIRONMENTAL HEALTH, DATED JANUARY 18, 2006

Scott Snyder

From: Moffat, Ewan [Ewan.Moffat@sdcounty.ca.gov]
Sent: Wednesday, January 18, 2006 3:44 PM
To: Scott Snyder
Cc: Linda Beresford
Subject: Northpark Closure Document.

Scott,

Here are some preliminary comments regarding 11/18/05 Closure Report. For the time being, I'll include comments relating to the LOP (west) tank; however, a separate document for the LOP tank will most likely be needed for that release in the future. Either way, all LOP tank related information should still be copied into the VAP document.

1. Page 6, 10.1 3rd line, has a statement regarding the northern portion being excavated prior to Ninyo & Moore taking on the job. This is very significant! I realize that Ninyo & Moore has nothing to do with that event but I will still need information regarding:

a. Any sampling that that could of occurred before, during and after this excavation (done by whomever),

b. Why this was done without advising us?
c. (most important), Where did that excavated soil go? Where is it now?

2. Soil gas locations and results. Although, Ninyo & Moore did not perform this, a diagram with the locations and results (over limits) should be included. A request for closure document (sort of like a CAP) should include all pertinent information even that done by other consultants. Perhaps you could superimpose the soil gas sample points onto a diagram like Figure 2.

3. Burn pit. Figure 7. Looks good but I need some vertical definition here. In short, two sets of cross sections (N-S and E-W) will be needed for the pit area alone.

4. Kansas Street (LOP) tank. Figure 8. Looks good but I need some vertical definition here. In short, two sets of cross sections (N-S and E-W) will be needed for the UST excavation area alone.

5. Kansas Street (LOP) tank. Figure 8 and Table 8. B7-17' TPHd – 520 ppm. Even without the vertical profile requested on item #4, I can see that 17' is the deepest portion of this excavation. 520 ppm TPHd at the bottom will require further vertical delineation such as a boring or further excavation.

I conducted a site visit today and it's looking good (former LOP tank area not yet built on, that helps!). If I have any more comments, I'll pass them your way.

Ewan Moffat
Environmental Health Specialist
Phone (619) 338-2212
Fax (619) 338-2315
ewan.moffat@sdcounty.ca.gov

APPENDIX B

EMAIL CORRESPONDENCE FROM SUN COUNTRY BUILDERS, DATED JULY 12, 2006

Scott Snyder

From: Daryl McFarland [dmcfarland@suncountrybuilders.net]
Sent: Wednesday, July 12, 2006 5:18 PM
To: Scott Snyder
Subject: RE: Renaissance early grading

Scott,

The export prior to discovery of the oil drum was taken to an industrial site at Camino de la Plaza and Boston Avenue in San Ysidro. This location is immediately adjacent to the border with Mexico.

From: Scott Snyder [mailto:ssnyder@ninyoandmoore.com]
Sent: Wednesday, July 12, 2006 12:57 PM
To: Daryl McFarland
Cc: Brian Wardwell
Subject: RE: Renaissance early grading

Daryl,

Yes, that is correct.

The reason we need the information is we prepared a closure report for the project for our involvement, part of which was to monitor the soil as it went off site. That soil we are talking about is the only soil we did not see go offsite. So if we can find out where it went, the County Environmental Health will be satisfied, and we can close this report.

Please call me if you have questions.
Scott

Scott Snyder, PG, HG
Senior Hydrogeologist
Ninyo & Moore
5710 Ruffin Road
San Diego, California 92122
858.576.1000 x1255

-----Original Message-----
From: Daryl McFarland [mailto:dmcfarland@suncountrybuilders.net]
Sent: Wednesday, July 12, 2006 12:31 PM
To: Scott Snyder
Cc: Brian Wardwell
Subject: Renaissance early grading

Scott,

As Brian was not involved in this project early on, I am taking over for him on your request for information. My understanding is that you are looking for the location(s) which received the export soils prior to discovery of the oil drum. Is this correct, and for what purpose?

Thanks,

Daryl McFarland
Sun Country Builders
138 Escondido Ave., #204

Vista, CA 92084
760-630-8042 - phone
760-630-3718 - fax

Table 6 - Summary of Burn Pit and Remediation Confirmation Sample Analytical Results

Sample ID	Date Collected	PAHs (µg/kg)	Antimony (mg/kg)	Arsenic (mg/kg)	Barium (mg/kg)	Cadmium (mg/kg)	Chromium (mg/kg)	Cobalt (mg/kg)	Copper (mg/kg)	Lead (mg/kg)	Mercury (mg/kg)	Nickel (mg/kg)	Silver (mg/kg)	Vanadium (mg/kg)	Zinc (mg/kg)
Initial Burn Pit Samples															
Pit 1-1	9/14/2004	ND	35.1	15.7	815	3.73	61.8	6.92	178	2190	0.088	18.9	4.26	15.3	4690
Pit 1-2	9/14/2004	ND	1.22	1.83	160	ND	8.37	2.67	9.3	43.7	ND	2.86	ND	18.2	84.2
Pit 1-3	9/14/2004	ND	ND	1.29	53.7	ND	8.6	3.53	8.17	22.8	ND	2.49	ND	20.3	53.2
Remediation Confirmation Samples															
NM03-S1	9/23/2004	ND	ND	ND	261	ND	8.93	1.51	6	4.27	ND	1.76	ND	23.5	9.35
NM03-S2	9/23/2004	ND	ND	ND	337	ND	8.85	1.56	6.2	4.53	ND	1.8	ND	20.6	10.5
NM03-S3	9/23/2004	ND	ND	ND	222	ND	8.6	2.77	7.56	19.9	ND	2.71	ND	22.6	92.5
NM03-S4	9/23/2004	ND	ND	ND	341	ND	8.75	1.59	6.22	4.73	ND	1.92	ND	21.3	10.4
NM03-S5	9/23/2004	ND	ND	0.831	518	ND	9.38	2.75	4.52	6.35	ND	3.22	ND	29.6	10.4
NM03-S6	9/23/2004	ND	ND	0.764	140	ND	6.86	3.05	4.5	5.67	ND	2.07	ND	20	20.7
Stockpile Samples															
NM03-SP1	9/23/2004	ND	ND	1.94	205	ND	8.12	2.33	6.02	10.9	ND	2.81	ND	21.4	23.6
NM03-SP2	9/23/2004	ND	ND	ND	269	ND	7.86	1.95	5.63	6.98	ND	1.88	ND	19.6	16.9
NM03-SP3	9/30/2004	ND	ND	1.25	198	ND	7.09	1.97	4.64	4.46	ND	2.07	ND	14	13
NM03-SP4	9/30/2004	ND	ND	1.54	220	ND	7.89	2.22	6.03	3.71	ND	2.33	ND	14.6	18.9
10X STLC		NA	150	50	1,000	10	50	800	250	50	2	200	50	240	2,500
Residential PRGs		NA	31	0.062	5,400	37	49	900	3,100	150	6	1,600	390	78	23,000
Industrial PRGs		NA	410	0.25	67,000	450	450	1,900	41,000	800	62	20,000	5,100	1,000	100,000

Notes:
µg/kg = micrograms per kilogram
mg/kg = Milligrams per kilogram
ND = Not detected at or above the reporting limit
PAHs = Polynuclear aromatic hydrocarbons
PRGs = Preliminary Remediation Goals
STLC = Soluble Threshold Limit Concentration

Ninyo & Moore

Table 7 - Summary of UST Removal and Remediation Soil Sample Analytical Results - 4327 Kansas Street (Heilig Meyers)

Sample ID	Date Collected	Sample Depth (feet bgs)	TPH-G (mg/kg)	TPH-D (mg/kg)	TRPH (mg/kg)	Detected VOCs	
						Ethylbenzene (µg/kg)	Naphthalene (µg/kg)
T1E-7	11/2/2004	7.0	39	260	610	8.9	180
T1W-7	11/2/2004	7.0	44	140	110	--	--
UST EX-SOUTH-6	11/11/2004	6.0	72	140	--	--	--
UST EX-WEST-6	11/11/2004	6.0	24	2,300	--	--	--
UST EX-EAST-6	11/11/2004	6.0	8.5	660	--	--	--
UST EX-NORTH-6	11/11/2004	6.0	190	5,400	--	--	--

Notes:
bgs = below ground surface
mg/kg = milligrams per kilogram
µg/kg = micrograms per kilogram
-- = Not analyzed
TPH-G = Total petroleum hydrocarbons, gasoline range
TPH-D = Total petroleum hydrocarbons, diesel range
TRPH = Total recoverable petroleum hydrocarbons

Table 8 - Summary of Post-Excavation Confirmation Soil Sample Analytical Results - 4327 Kansas Street (Helig Meyers)

Sample ID	Sample Depth (feet)	Date Collected	TPH-G (mg/kg)	TPH-D (mg/kg)	Benzene (µg/kg)	Toluene (µg/kg)	Ethylbenzene (µg/kg)	Xylenes (µg/kg)	Naphthalene (µg/kg)
NW1-7'	7	1/31/2005	ND	ND	ND	ND	ND	ND	ND
NW2-11'	11	1/31/2005	ND	ND	ND	ND	ND	ND	ND
NW3-10'	10	2/4/2005	ND	ND	ND	ND	ND	ND	ND
EW1-10'	10	2/4/2005	ND	ND	ND	ND	ND	ND	ND
EW2-10'	10	2/4/2005	ND	ND	ND	ND	ND	ND	ND
EW3-10'	10	2/4/2005	ND	ND	ND	ND	ND	ND	ND
WW1-10'	10	1/31/2005	ND	**16**	ND	ND	ND	ND	ND
WW2-12'	12	1/31/2005	ND	**860**	ND	ND	ND	ND	ND
WW3-10'	10	2/4/2005	ND	ND	ND	ND	ND	ND	ND
WW4-10'	10	2/4/2005	ND	ND	ND	ND	ND	ND	ND
WW5-10'	10	2/4/2005	ND	ND	ND	ND	ND	ND	ND
SW1-10'	10	2/7/2005	ND	ND	ND	ND	ND	ND	ND
SW2-10'	10	2/7/2005	**33***	**750**	ND	ND	ND	ND	ND
SW3-10'	10	2/7/2005	ND	ND	ND	ND	ND	ND	ND
B1-11'	11	1/31/2005	ND	ND	ND	ND	ND	ND	ND
B2-13'	13	2/4/2005	ND	ND	ND	ND	ND	ND	ND
B3-13'	13	2/4/2005	ND	ND	ND	ND	ND	ND	ND
B4-13'	13	2/4/2005	ND	ND	ND	ND	ND	ND	ND
B5-13'	13	2/4/2005	ND	ND	ND	ND	ND	ND	ND
B6-10'	10	2/4/2005	ND	ND	ND	ND	ND	ND	ND
B7-17'	17	2/4/2005	**20***	**520**	ND	ND	ND	ND	ND
B8-15'	15	2/4/2005	ND	ND	ND	ND	ND	ND	ND
B9-14'	14	2/4/2005	ND	ND	ND	ND	ND	ND	ND

Notes:
mg/kg = Milligrams per kilogram
µg/kg = Micrograms per kilogram
ND = Not detected at or above the reporting limit
TPH-G = Total petroleum hydrocarbons, gasoline range
TPH-D = Total petroleum hydrocarbons, diesel range
TRPH = Total recoverable hydrocarbons
* = indicates sample was reported as gasoline, but did not match chromatographic pattern of gasoline (unknown hydrocarbon)

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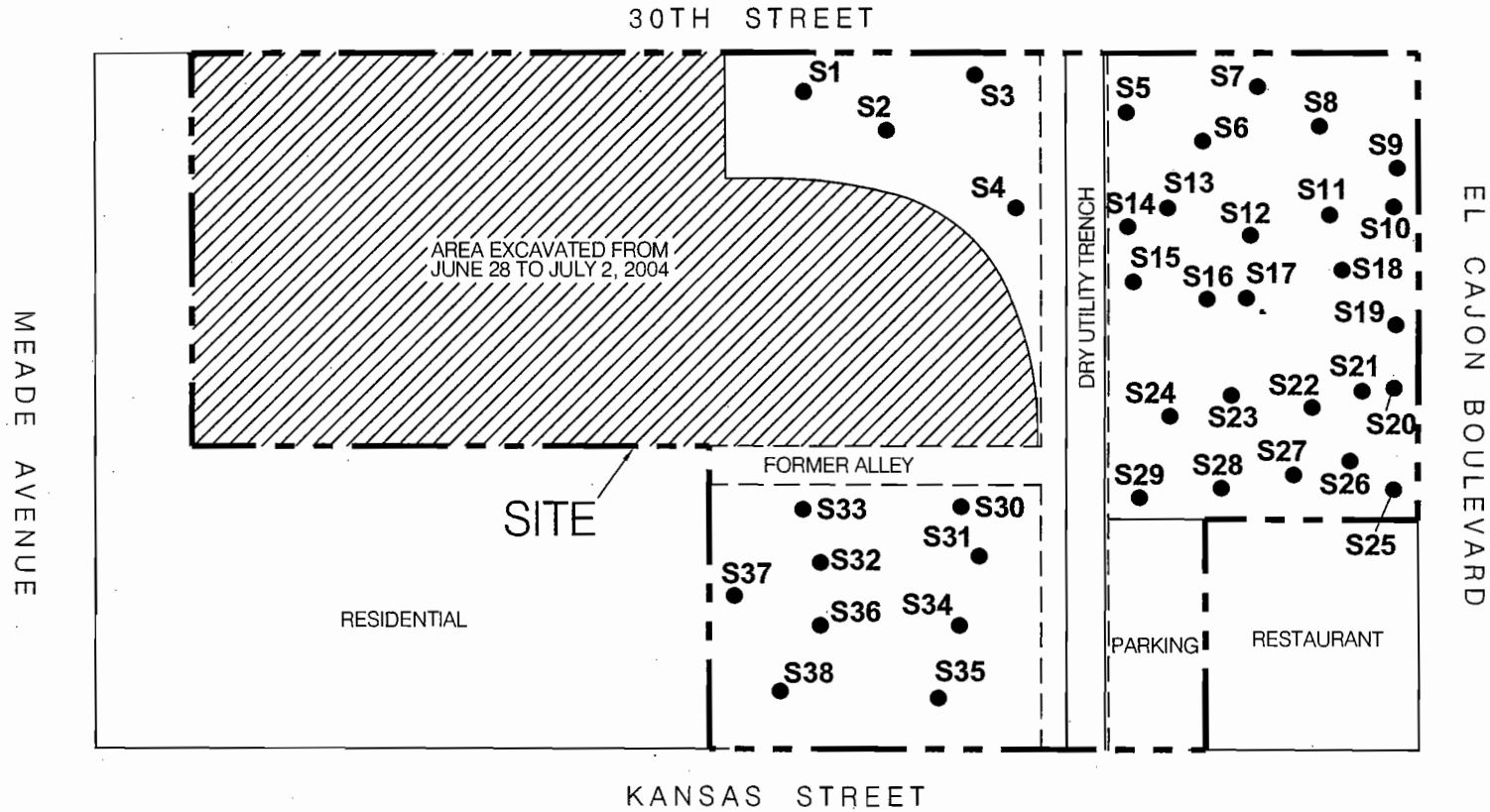


LEGEND

● **S38** Approximate soil sample location, 7/28/04

NOTE: ALL DIMENSIONS ARE APPROXIMATE.

Ninyo & Moore

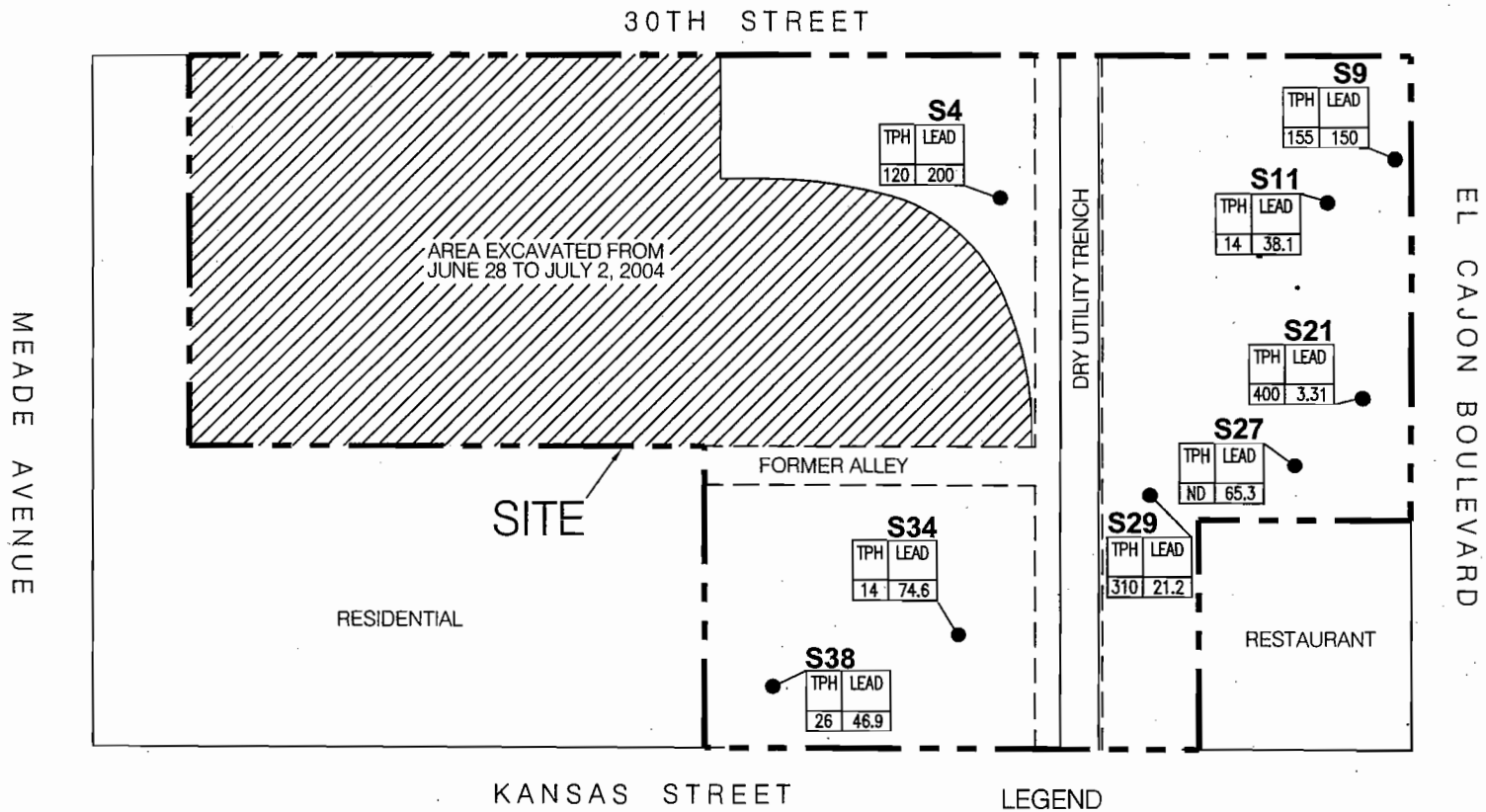
0 80 160

Approximate Scale in Feet

SITE GRADING-RANDOM SOIL SAMPLE LOCATIONS

RENAISSANCE AT NORTH PARK
30 TH STREET AND EL CAJON BOULEVARD
SAN DIEGO, CALIFORNIA

PROJECT NO.	DATE	FIGURE
105187006	11/05	3



S38 — Sample ID
TPH 26 LEAD 46.9 — Result in mg/kg

LEGEND

●S38	Approximate soil sampling location with elevated TPH and/or lead, 7/28/04
mg/kg	Milligrams per kilogram
TPH	Total petroleum hydrocarbons (mg/kg)
ND	Not detected at or above the reporting limit

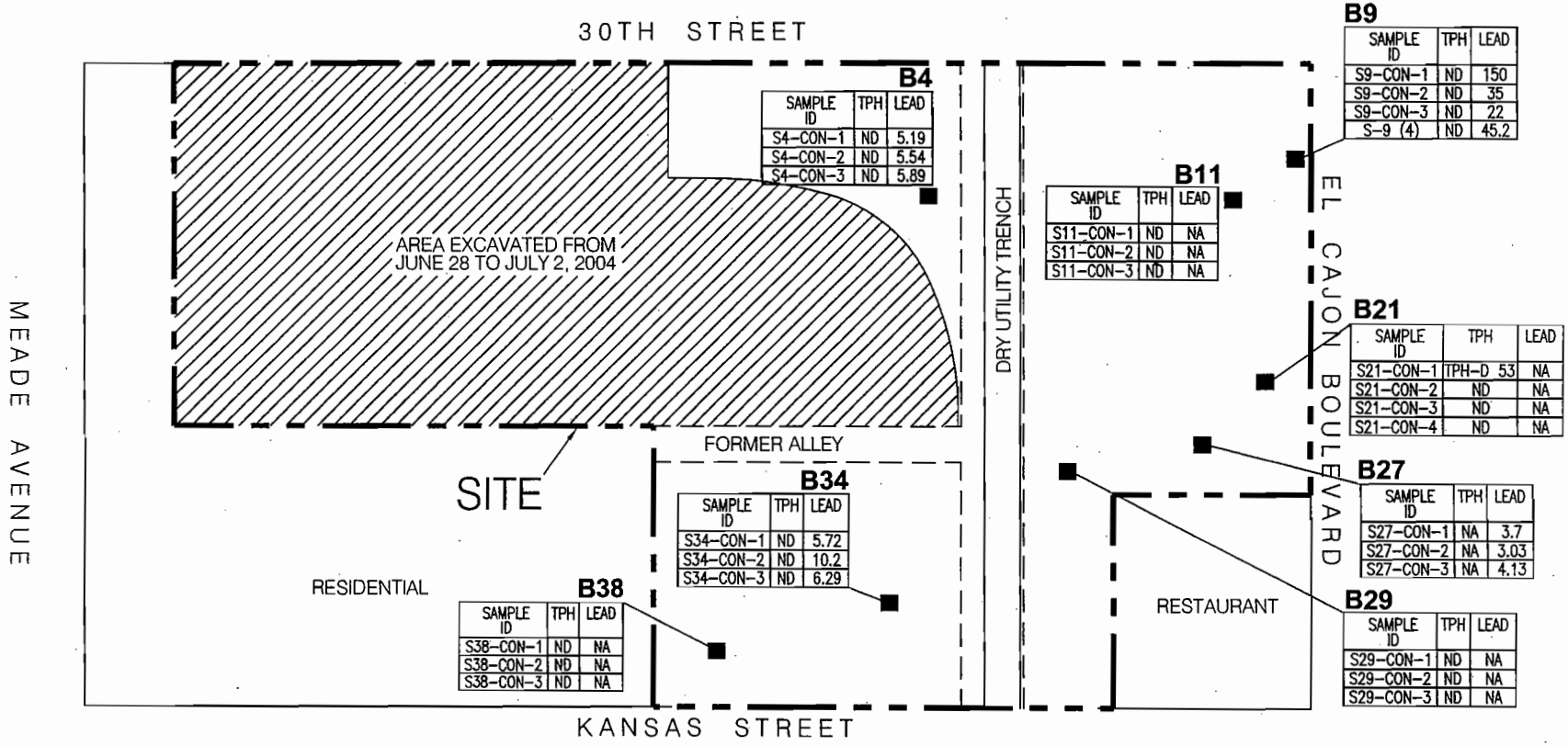
NOTE: ALL DIMENSIONS ARE APPROXIMATE.

Ninyo & Moore

0 80 160
Approximate Scale in Feet

SITE GRADING-LOCATIONS OF TPH AND/OR LEAD-IMPACTED SOILS
RENAISSANCE AT NORTH PARK
30 TH STREET AND EL CAJON BOULEVARD
SAN DIEGO, CALIFORNIA

PROJECT NO.	DATE	FIGURE
105187006	11/05	4



LEGEND

B38 — Sample ID
— Analyte
— Result in mg/kg

SAMPLE ID	TPH	LEAD
S38-CON-1	ND	NA
S38-CON-2	ND	NA
S38-CON-3	ND	NA

■ **B38** Approximate soil excavation location, 8/10/04

TPH Total petroleum hydrocarbons (gasoline, diesel, extended range)

ND Not detected at or above the reporting limit

NA Not analyzed

NOTE: ALL DIMENSIONS ARE APPROXIMATE.

Ninyo & Moore

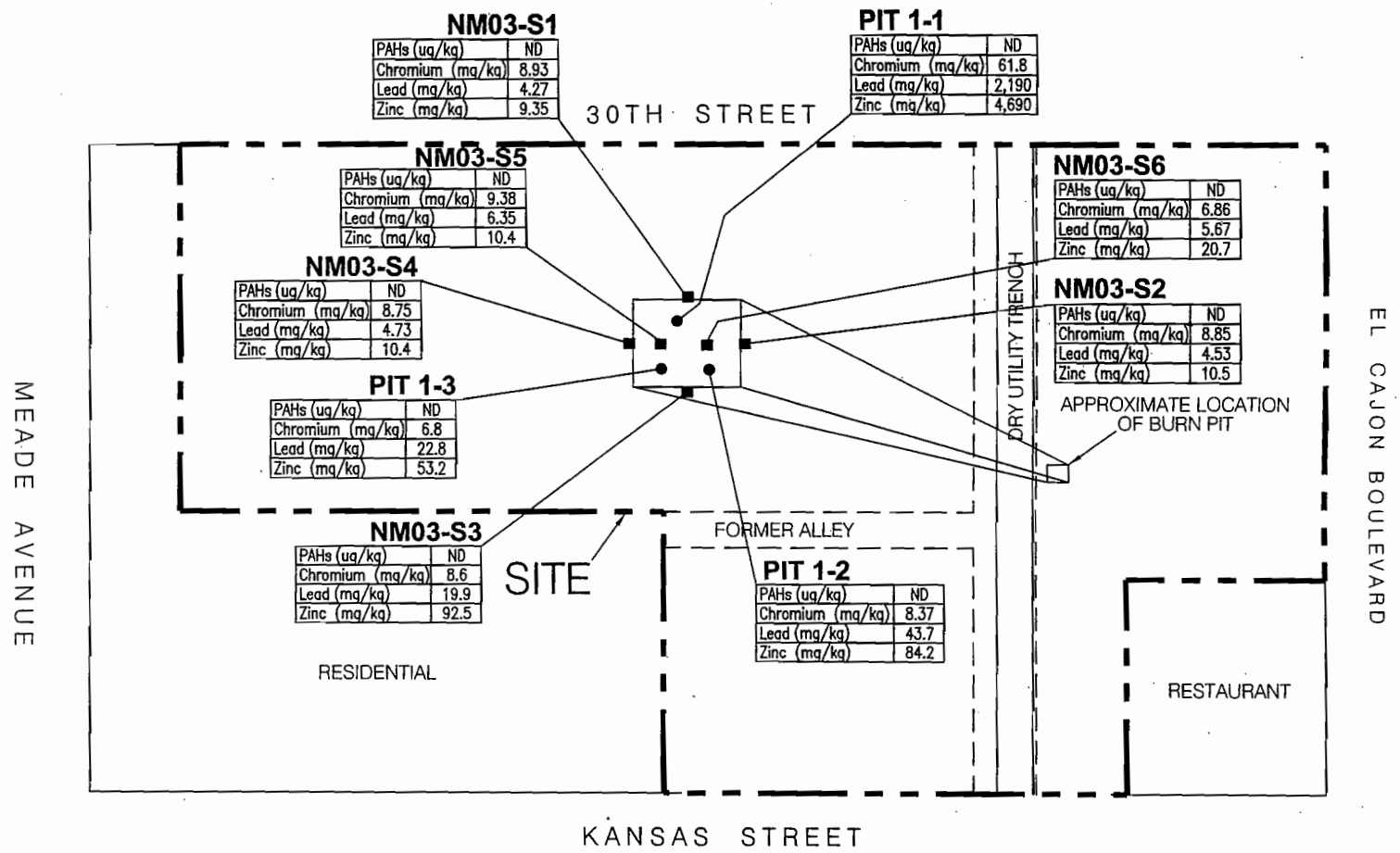
0 80 160

Approximate Scale in Feet

SITE GRADING-POST EXCAVATION
CONFIRMATION SOIL SAMPLE ANALYTICAL RESULTS

RENAISSANCE AT NORTH PARK
30 TH STREET AND EL CAJON BOULEVARD
SAN DIEGO, CALIFORNIA

PROJECT NO.	DATE	FIGURE
105187006	11/05	5



LEGEND

mg/kg	milligrams per kilogram	PAHs	Polynuclear aromatic hydrocarbons
ug/kg	micrograms per kilogram	● PIT 1-3	Approximate pre-excavation sample location, 9/14/04
ND	Not detected at or above the reporting limit	■ NM03-S6	Approximate confirmation soil sample location, 9/23/04

NOTE: ALL DIMENSIONS ARE APPROXIMATE.

Ninyo & Moore

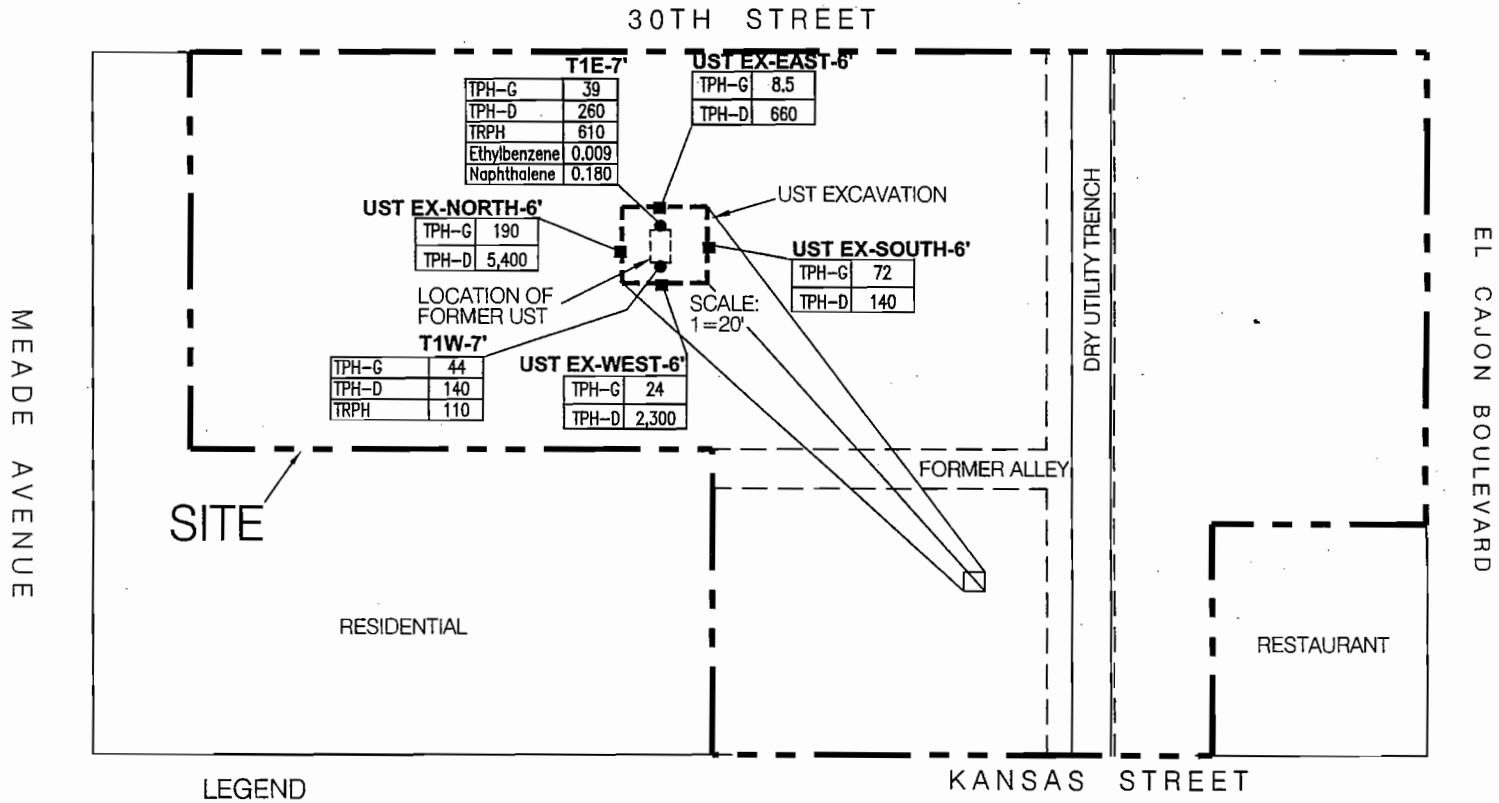
0 80 160

Approximate Scale in Feet

BURN PIT SAMPLE LOCATIONS

RENAISSANCE AT NORTH PARK
30 TH STREET AND EL CAJON BOULEVARD
SAN DIEGO, CALIFORNIA

PROJECT NO.	DATE	FIGURE
105187006	11/05	7



LEGEND

■ **UST EX-WEST-6'**	Approximate location of post-excavation soil sample, 11/11/04
● **T1E-7**	Approximate location of post-UST removal soil sample, 11/2/04
TPH-G	Total petroleum hydrocarbons as gasoline in milligrams per kilogram (mg/kg)
TPH-D	Total petroleum hydrocarbons as diesel (mg/kg)
TRPH	Total recoverable petroleum hydrocarbons (mg/kg)

UST EX-WEST-6' —Sample ID

TPH-G	24
TPH-D	2,300

Analyte — Result in mg/kg

Ninyo & Moore

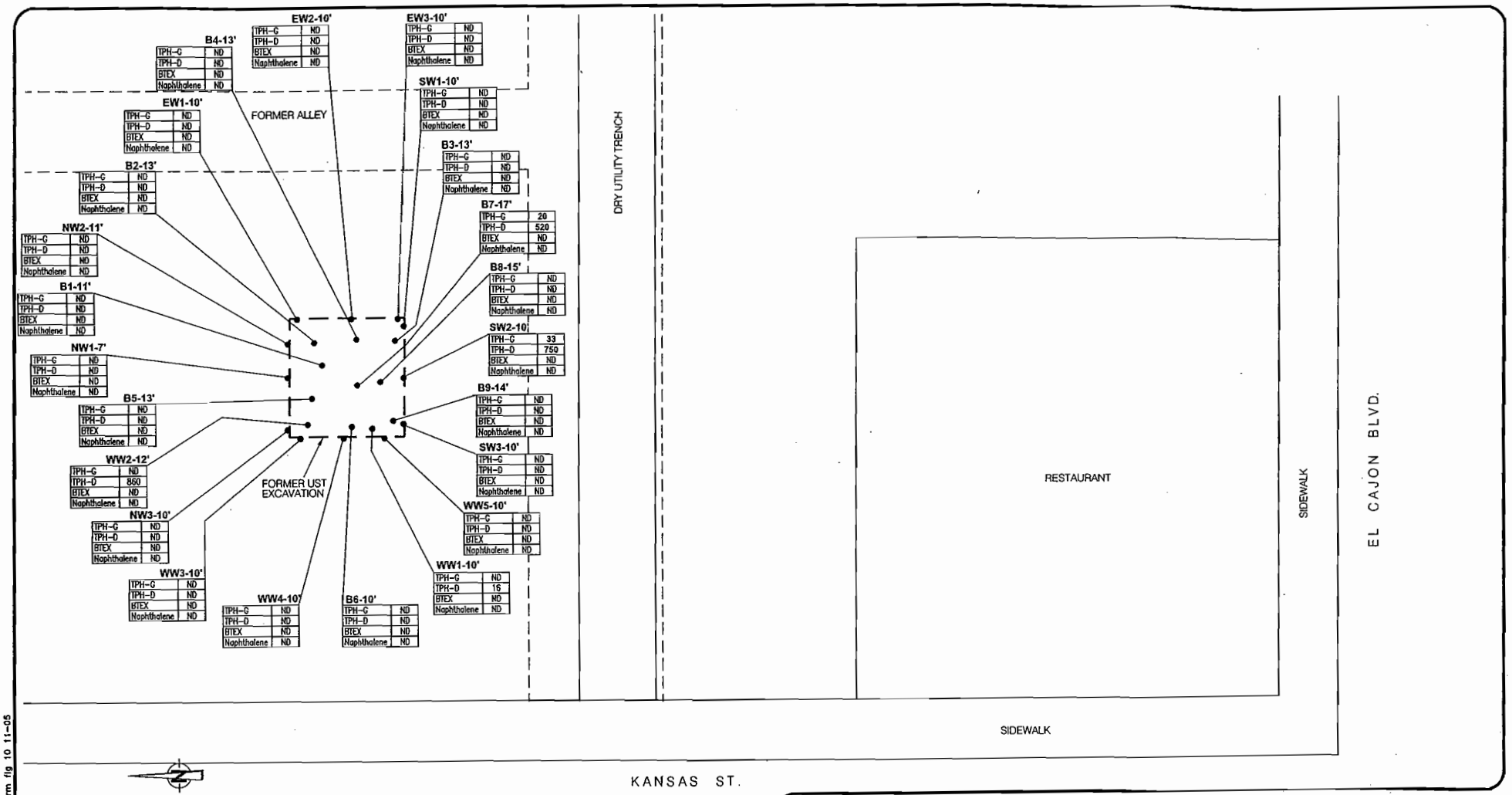
0 80 160

Approximate Scale in Feet

HEILIG MEYERS 4327 KANSAS STREET POST-UST REMOVAL AND SOIL EXCAVATION SOIL SAMPLE ANALYTICAL RESULTS

RENAISSANCE AT NORTH PARK
30 TH STREET AND EL CAJON BOULEVARD
SAN DIEGO, CALIFORNIA

PROJECT NO.	DATE	FIGURE
105187006	11/05	8



Ninyo & Moore

KANSAS STREET SOIL REMEDIATION CONFIRMATION SAMPLE ANALYTICAL RESULTS

RENAISSANCE AT NORTH PARK
30 TH STREET AND EL CAJON BOULEVARD
SAN DIEGO, CALIFORNIA

PROJECT NO.	DATE	FIGURE
105187006	11/05	9

105187006 remediation confirm fig 10 11-05

APPENDIX B

REFERENCES

REFERENCES

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